

PP1219

Our ref: [REDACTED]
Your ref: LDP 2020

Local Development Plan Team
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If telephoning ask for:
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31 July 2020

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

Dear Sir/Madam

ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020: PROPOSED PLAN

Thank you for your consultation email which SEPA received on 13 April 2020 highlighting the publication of your Proposed Plan (hereinafter referred to as the Plan). We welcome the opportunity to comment on the Plan as part of the ongoing and productive liaison between us.

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

We are pleased to confirm there is only one site within the Plan, Tipperty OP2, which we consider should be removed due to flooding constraints unless further action is undertaken prior to finalisation of the Plan as detailed in Appendix 2, section 2.2 of this letter. There are also a significant number of sites where we request some rewording to the allocation text/developer requirements as set out in Appendix 2. We hope these can be agreed as minor modifications to the Plan.

In addition, we request minor rewording or additional wording to a number of Policies and Appendices as set out in the attached Appendix 1. We have indicated where we will **object** to the Policy or Appendix if these requests cannot be dealt with as minor modifications.

In addition, our comments on the Environmental Report have been provided separately via the Scottish Government SEA gateway. Should you wish to discuss this letter please do not hesitate to contact me by email at planning.aberdeen@sepa.org.uk.

Yours sincerely

[REDACTED]
Senior Planning Officer



Chairman
[REDACTED]
Chief Executive
[REDACTED]

SEPA Aberdeen Office
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Planning Service

ECopy to: Case officer, [REDACTED]

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our website planning pages.

PCS170943 APPENDIX 1: SEPA RESPONSE TO ABERDEENSHIRE PROPOSED LOCAL DEVELOPMENT PLAN

GENERAL

We previously provided comments on the existing policies on 8 April 2019 ([REDACTED]) in our response to the Main Issues Report (MIR) and are pleased that many of our requests and recommendations have been incorporated into the Proposed Plan (hereinafter referred to as the Plan).

Unfortunately, however, there are a number of Policies where our previous requests for rewording do not appear to have been taken forward into the Plan and consequently we have indicated below where we will **object** to the wording of these policies unless they are modified before the Plan is finalised. As our requests for modifications do not add, remove or significantly alter any policy **we hope we can work with you to resolve these matters as non-notifiable modifications.**

To assist you, our comments below are in order of the plan, apart from our detailed comments on the settlement statements and allocations (Appendix 7a-e) which are given in Appendix 2 of this response. Modified/new wording we request is highlighted in bold with text we request to be removed struck through, with reasoning why we request these changes given below the requested modifications.

Aberdeenshire Proposed Local Development Plan 2020

Introduction and Policies

SECTION 1 HOW TO USE THIS PLAN

We have no comments on this section of the plan

SECTION 2 INFLUENCES ON THE PLAN

Modification:

We **request** the following rewording to paragraph 2.3, 7th bullet point:

- ~~the emerging Flood Risk Management Plan;~~ **the North East Flood Risk Management Plan and the Tay Estuary and Montrose Flood Risk Management Plan;**

Reason:

There are now two Flood Risk Management Plans in place covering the Plan area – to say it is in line with an “emerging plan” is inaccurate.

SECTION 3 VISION FOR THE PLAN AND ITS PURPOSE

Modification:

We **recommend** the following rewording of paragraph 3.13, last bullet point:

- An area...local green spaces and **green-blue** networks as an...”

Reason:

We welcome the adoption of reference to ‘green-blue’ networks throughout the plan. For consistency we recommend the addition of this term in paragraph 3.13

SECTION 4 – PURPOSE OF THE LDP AND OUTCOMES

Modification:

We welcome and support the rewording of this policy but **strongly recommend** the following **additional modification** of the last sentence in paragraph 4.6: To promote the creation of green-blue networks within and between settlements:

“... The Local Development Plan will protect and promote green-blue networks. **Green-blue networks can have multiple benefits for nature and wellbeing especially in a Placemaking context.** ~~where they have been created, or there is a firm plan for their establishment, but is unable to promote anything other than aspiration”.~~

Reason:

To reinforce the benefits of blue-green networks and give a more positive and optimistic approach to the purpose and outcome of the Plan.

SECTION 5 THE SPATIAL STRATEGY

We have no comments on this section of the plan

SECTION 6 SHAPING BUSINESS DEVELOPMENT

Policies B1, B2, B3 and B4

Modification:

We will be supportive of the wording of these policies only if our requested rewording of Policy C4 (see below) in relation to redevelopment and change of use is undertaken. We would also **recommend** cross referencing to Policy C4 in regard to redevelopment/change of use.

If our rewording to Policy C4 with regards to potential increase in vulnerability and redevelopment is not undertaken, then we will **object to Policies B1, B2, B3 and B4** unless reference is made to this issue in these policies to ensure accordance with the SEPA Flood Risk and Land Use Vulnerability Guidance as referenced by Scottish Planning Policy.

Reason:

As stated in our MIR response, certain business development has the potential to introduce increased vulnerability uses to a site, for example, tourist facilities which provide overnight accommodation, particularly tents or caravans, and ancillary uses to business sites such as day care nurseries. Also, in relation to Policy B4, a significant proportion of the Regeneration Priority Areas lie within Potentially Vulnerable Areas (areas where significant flood risk exists now or is likely to occur in the future) identified in the National Flood Risk Assessment.

We are happy to discuss this issue in more detail in order to ensure policy wording that supports the Council's ambitions for economic development is but addresses potential issues with regard to flood risk vulnerability and particular use types.

SECTION 7 SHAPING DEVELOPMENT IN THE COUNTRYSIDE

Policy R1 Special Rural Areas

Modification:

We will be supportive of the wording of this policy only if our requested rewording of Policy C4 (see below) in relation to change of use is undertaken. If our rewording to Policy C4 with regards to potential increase in vulnerability and redevelopment/change of use are not undertaken, then we will **object to Policy R1.5** unless the wording of this is modified to ensure development will only be acceptable where there is no increase in vulnerability to flood risk, highlighting that any conversion or new development must be in line accordance with SEPA Flood Risk and Land Use Vulnerability Guidance as referenced by Scottish Planning Policy.

Reason:

As stated in our MIR response, whilst we welcome the restoration of/conversion of existing buildings, this has the potential to introduce increased vulnerable uses to a site particularly in terms of overnight accommodation. We are happy to discuss this issue in more detail in order to ensure policy wording that supports the Council's ambitions for economic development is also cognisant of the issues with regard to flood risk and particular use types.

Policy R2 Development proposals elsewhere in the Countryside

We note the changes to this policy and confirm we have no further comments to make.

Policy R3 Minerals

We note the changes to this policy and confirm we have no further comments to make.

Policy R4 Hill Tracks

Modification:

We request the following correction to the wording in the second sentence of this policy:

“Hill tracks...carbon risk rich soils...”

Reason:

Typographical

SECTION 8 SHAPING HOMES AND HOUSING

Policy H1 – Housing Land

We note the changes to this policy and confirm we have no further comments to make.

Policy H2 Affordable Housing

We have no comments to make on this policy.

Policy H3 Special Needs Housing

We have no comments to make on this policy.

Policy H4 – Residential Caravan

Modification:

We **request** the following additional wording to the second sentence:

“In cases...providing the siting respects the character and amenity of the area, **avoids areas of flood risk**, and the caravan is satisfactorily serviced”

Reason:

Caravans and mobile homes are classed as a ‘Most vulnerable use’ in our Flood Risk and Land Use Vulnerability Guidance as referenced by Scottish Planning Policy. The flooding events of 2015/2016 demonstrated how vulnerable caravans are to flood risk, and recent flood events show they can happen at any time of the year. Therefore, even a temporary period of use, in an area of flood risk can pose a risk to the caravan and its occupants. Due to this land use sensitivity we **request** this risk is identified in this policy.

We confirm will **object** to this policy if this additional wording is not added to it.

Policy H5 – Gypsies and Travellers

Modification:

Whilst welcome the insertion ‘subject to other policies’ of this policy, we **request** the following additional wording to paragraph H5.3:

“Proposals must also **avoid areas of flood risk**, provide a secure environment and...”

Reason:

As stated above caravans and mobile homes are classed as a 'Most vulnerable use' in our Flood Risk and Land Use Vulnerability Guidance as referenced by Scottish Planning Policy. The flooding events of 2015/2016 demonstrated how vulnerable caravans are to flood risk, and more recent flood events show they can happen at any time of the year. Therefore, even a temporary period of use, in an area of flood risk can pose a risk to the caravan/mobile home and its occupants. Due to this land use sensitivity we request this risk is more strongly mitigated in this policy.

We will **object** to this policy if this additional wording is not added, or at minimum, the following foot note is added to the "subject to other policies"⁷

⁷ In particular sites must be in accordance with SEPA Flood Risk and Land Use Vulnerability Guidance

SECTION 9 SHAPING PLACES

Policy P1 Layout, Siting and Design

We welcome the reference to new Appendix 8 Successful Placemaking Design Guidance and Appendix 9 Building Design Guidance. We have provided separate comments on these appendices below.

Policy P2 Open Space and Access in New Development

We welcome the new reference to 'green-blue' infrastructure in this policy and the new Appendix 10 Standards for Open Space. We have provided separate comments on this Appendix below.

Policy P3 Infill Development with Settlements and Householder Developments

Modification:

We will be supportive of the wording of this policy only if our requested rewording of Policy C4 (see below) in relation to vulnerability and change of use is undertaken. If our rewording to Policy C4 with regards to potential increase in vulnerability and redevelopment/change of use are not undertaken, then we will **object to Policy P3** unless the wording of this is modified to ensure development will only be acceptable where there is no increase in vulnerability to flood risk, highlighting that any conversion or new development must be in accordance with SEPA Flood Risk and Land Use Vulnerability Guidance as referenced by Scottish Planning Policy.

Reason:

As stated in our MIR response, whilst we welcome infill development, we request the Plan gives more detail on acceptable change of uses in terms of flood risk and vulnerability. We are happy to discuss this issue in more detail in order to ensure policy wording that supports the Council's ambitions for infill development is also cognisant of the issues with regard to flood risk and particular use types.

Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land

We note and welcome the rewording undertaken for P4.1 and 4.2 of this policy.

Policy P5 Digital Infrastructure

We have no comment on this policy

Policy P6 Community Facilities and Public Amenities

We have no comment on this policy

SECTION 10 NATURAL HERITAGE AND LANDSCAPE

Policy E1 Natural Heritage

Modification:

Whilst we support the rewording of paragraph E1.8, we **request** the following **additional modification**, as previously requested in our MIR response. We confirm we will **object** to this policy in the Plan if the following additional modifications to this paragraph are not undertaken:

E1.8 The following criteria may apply if development may affect ~~the~~ undesignated habitats or **habitats** and species listed in Annex I, **and** Annex II of the EC Habitats Directive, or species listed in Annexes I and II of the EC Birds Directive. Similar tests will apply to habitats, species on the Scottish Biodiversity List, North East Scotland Biodiversity Partnership Local Important Species, ~~and~~ other species of importance to biodiversity **and Groundwater Dependent Terrestrial Ecosystems (GWDTE)**. Areas of importance to geodiversity, or semi-natural habitats are also given this protection. We will only approve:

- when a baseline Ecological Survey has been carried out;
- when the development has been designed to avoid impacts where possible; and
- where impacts cannot reasonably be avoided, an ecological or geological management plan demonstrates public benefits that outweigh the ecological or geological value of the site and includes necessary mitigation **and** compensation measures **to result in net ecological gain**.

Reason:

Typographical and to be consistent with, and reinforce, Policy P1.7 and Policy PR1.4.

Policy E 2 Landscape

We have no comment on this policy

Policy E3 Forestry and Woodland

We have no comment on this policy

SECTION 11 THE HISTORIC ENVIRONMENT

Policy HE1 Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites

We have no comment on this policy

Policy HE2 Protecting Historic, Cultured and Conservation Sites

We have no comment on this policy

Policy H3 Helping to Reuse Historic Buildings at Risk

We have no comment on this policy

SECTION 12 PROTECTING RESOURCES

Policy PR1 Protecting Important Resources

Air Quality

We note and welcome the amendments we previously requested have been made to Policy 1.2 and confirm we have no further comments to make.

Water Environment:

Modification:

Whilst we support the rewording of paragraph PR1.3, we **request** the following **additional modification**. We confirm we will **object** to this policy in the Plan if better reference to the Scotland River Basin Management Plan (RBMP) is not made here, or elsewhere in the Plan:

“PR1.3 New development... or maintain good ecological status^{1,2}.”

¹ The current status of a classified waterbody can be found via SEPA’s River Basin Management Planning web page: <https://www.sepa.org.uk/environment/water/river-basin-management-planning/>

^{1,2} Development proposals within the River Dee catchment area may require a Construction Method Statement ~~in the~~ interests of **which addresses** the interests of the River Dee SAC.

Reason:

Not all waterbodies have been ‘classified’ therefore reference to the RBMP should be made here by the way of an additional footnote, or other means. Although the RBMP is cited as an important document relevant to the Plan on Page 10, there is no reference elsewhere in the Plan to the RBMP. Therefore we request it is made here.

With reference to the existing footnote 1, construction method statements may be required for any development site close to a water body that has the potential to cause pollution to that waterbody, not just sites adjacent to the River Dee. Slight rewording will emphasise what the required construction method statement needs to specifically address for these sites.

Open Space

We note and welcome the amendments we previously requested that have been made to Policy PR1.6. We confirm we have no further comments to make.

Peat and carbon rich soils

Modification:

We previously requested the following modification to PR1.10. We confirm we will **object** to this policy in the Plan **if this additional text and footnote are not added** to this policy, or not added to Policy C3:

“This resource is protected under Policy C3 ... greater than 0.5mm depth. **Where this resource is present, a soil or peat survey will be required to demonstrate that the highest quality of soil or deepest peat have been avoided. A soil or peat management plan will also be required to demonstrate that any unnecessary disturbance, degradation or erosion has been minimised, and includes proposed mitigation measures.**⁷”

⁷ Further information on how to undertake a peat survey can be found in the Scottish Government’s Guidance on “Developments on Peatland: Peatland Survey (2017)”

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

Policy PR2 Reserving and Protecting Important Development Sites

We welcome the inclusion of cemeteries within PR2.1 of this policy and that they have also been identified as protected sites in the Settlement Plans. We have given more detailed comments on the individual cemetery allocations in Appendix 7.

Policy PR3 Reuse, Recycling and Waste

We **support** the rewording of this policy and have no further comment.

SECTION 13 CLIMATE CHANGE

Policy C1 Using Resources in Buildings

We are disappointed to note the preferred option in the MIR, which we supported, of replacing “Gold” standard with “Platinum” sustainability label has not been taken forward to into the Plan and that it has been replaced by a ‘Silver’ for the Target Emissions Rate and ‘Gold’ for water efficiency. We **strongly recommend** Aberdeenshire Council modifies this policy to require stronger sustainable design in relation to the Scottish Building Standards with “Silver” replaced with “Gold” for the Target Emissions Rate. We highlight to you that other local authorities, including Aberdeen City Council, Glasgow City Council, and Perth & Kinross Council have/are updating their policies/supplementary guidance requiring developments to achieve at least Gold Standards by 2020. Making more efficient use of water is important in adapting to climate change and protecting wildlife and natural resources. This is of particular relevance to parts of Aberdeenshire that rely on water abstracted from the River Dee which is a Special Area of Conservation. We would encourage the Council to stipulate a “Platinum level” is required to be achieved for water efficiency. We would fully support the requirement for new developments within Aberdeenshire to be designed to higher levels than the minimum standards and for this requirement to be supported in the relevant Appendices of the Plan with further guidance given to developers on how they can achieve these standards given in Appendix 8 and Appendix 9.

However, we welcome the inclusion of paragraphs C1.3 and C1.5 which identify the circumstances where developments will be expected to consider district heating schemes, and what is expected from Energy Statements submitted at planning application stage. We **support** the inclusion of this clear position.

Policy C2 Renewable Energy

Modification:

We **strongly recommend** the **C2.1 paragraph is replaced** with the following:

“C2.1 We will support renewable energy technology developments that are proposed on appropriate sites and of the appropriate design. This support is not at the expense of other policies regarding Natural Heritage, Built Heritage and Protecting Natural Resources. Biomass schemes (energy from biological material derived from living or recently living organisms) will be treated as industrial process suitable for business land. These may be hazardous developments through their impact on air quality.”

And we **request** the following **additional wording** to the first sentence in C2.6

“C2.6 We will approve hydro-electric schemes if...adverse impacts on the water and surrounding natural environment”

Reason:

Whilst we welcome the positive policy wording and cross referencing of other policies in C2, the first sentence of paragraph C2.1 is still restrictive in terms of the types of renewable energy development that Aberdeenshire Council is supportive of. Listing specific types of renewable energy excludes those that are not listed. We therefore strongly recommend a more general statement in the first sentence to cover all possible renewable energy technology.

In relation to hydro-electric development, these developments, like many other forms of development, require ancillary development which is not situated within the water environment, such as access tracks. Therefore possible impact on the wider natural environment must also be considered.

Modification:

We **strongly recommend** the following additional paragraph (or similarly worded) to Policy C2, inserted after the current C2.8 paragraph:

“C2.9 Part of the development of renewable energy and ensuring there is adequacy of supply is the development of energy storage. We will therefore support proposals for energy storage as part of low carbon energy proposals that will be supported as long as they meet other plan policy requirements.”

Reason:

Having a policy within the Plan which makes reference to energy storage will provide certainty to the community and developers that this type of development is considered appropriate and necessary by Aberdeenshire Council.

SPP paragraph 167 and 168 advises Local Planning Authorities that they should (underlining added for emphasis:

“167. Development plans should identify areas capable of accommodating renewable electricity projects in addition to wind generation, including hydro-electricity generation related to river or tidal flows or energy storage projects of a range of scales.

168. Development plans should identify areas which are weakly connected or unconnected to the national electricity network and facilitate development of decentralised and mobile energy storage installations. Energy storage schemes help to support development of renewable energy and maintain stability of the electricity network in areas where reinforcement is needed to manage congestion. Strategic development planning authorities are expected to take the lead in dealing with cross-boundary constraints and opportunities and will coordinate activity between constituent planning authorities.”

An oversupply of energy is likely to become more of an issue the closer that Scotland gets to realising its 100% electricity from renewables target and energy storage will be essential to help realise the ambition to become a net renewable energy exporter.

Policy C3 Carbon Sinks and Stores

We welcome the additional reference to Class 5 in paragraph C3.1. We have no further comment to make on this policy.

Policy C4 Flooding

Modification

In our response to the MIR we requested rewording of this policy but this does not appear to have been taken forward into the Plan. We confirm we will **object** to this policy if our following rewording/additional text requests are not undertaken:

C4.1 Flood Risk Assessments should be undertaken in accordance with SEPA Technical Flood Risk Guidance⁸ and will be required for development in the **indicative** medium to high category of flood risk of 0.5% **or greater** -10% annual probability (1 in 200 years **or more frequent** ~~to 1 in 10 years~~)⁹. Assessment may also be required in areas of lower annual probability (~~0.25~~ **0.1%-0.5% annual probability**) in circumstances where other factors indicate a potentially heightened risk or there are multiple sources of potential flooding. Assessment should include an allowance for freeboard¹⁰ and climate change¹¹. Development should **not increase flood risk vulnerability**¹² **and** should avoid areas of medium to high risk, functional floodplain or other areas where the risks are otherwise assessed as heightened or unacceptable except where:

- It is a development to **effect alleviate** flooding or erosion of riverbanks or the coast;
- It is consistent with the flood storage **and conveyance** function of a floodplain;
- It would otherwise be less affected by flooding (such as a play area or car park);
- It is essential infrastructure. The location is essential for operational reasons for example for water-based navigation, agriculture, transport or utilities infrastructure and an alternative lower risk location is not available^{12 13}.

C4.2 If development is to be permitted on land assessed as at a medium to high risk of flooding it should be designed to be flood resilient for the lifetime of the development (~~this is normally a minimum of 100 years for residential development~~) and use construction methods to assist in the evacuation of people and minimise damage. It must not result in increased severity of flood risk elsewhere through altering flood storage capacity or the pattern and flow of flood waters.

C4.3 ~~Buffer strips, for enhancement of the watercourse and necessary maintenance, must also be provided for any water body~~¹³. **Policy PR1.3 requires buffer strips to all waterbodies. Wider buffer strips may be required to mitigate flood risk depending on the topography or river dynamics.**¹⁴

C4.4 These measures may also be required in areas of potentially lower risk of flooding (annual probability of more than 1:1000 years) or in coastal areas below the 10 metre contour should ~~local~~ evidence demonstrate a heightened risk^{13 15}.

C4.5 In such areas land raising and/or excavations will only be permitted if it is for a flood alleviation measure, it is linked to the provision and maintenance of direct or indirect compensatory flood water storage to replace the lost capacity of the functional floodplain, and it will not create any inaccessible islands of development during flood events or result in the need for flood prevention measures elsewhere.

C4.6 We will not approve development that may contribute to flooding issues elsewhere. Sustainable Urban Drainage principles apply to all sites.

C4.7 We are opposed to the enclosed culverting of watercourses for land gain and will actively seek to discourage such proposals. We encourage the daylighting (or de-culverting) of existing culverted watercourse¹⁶

8 Guidance on technical guidance for developers is provided in Technical Flood Risk Guidance for Stakeholders - SEPA requirements for undertaking a Flood Risk Assessment ~~—2019~~.

9 The Scottish Environment Protection Agency (SEPA) have produced indicative maps of flood risk areas and these are a useful starting point for developers in considering the location of their proposals.

10 Freeboard is ~~the allowance made for natural variations in~~ **an extra allowance provided above estimated** flood levels. It is a factor of safety in flood protection design (usually expressed as height above flood level), which allows for factors related to the uncertainty in estimating flood risk (e.g. wave action, settlement, morphological changes).

11 ~~In 2019 SEPA advised on the freeboard~~ Freeboard and climate change allowances **advice can be found** in their document Technical Flood Risk Guidance for Stakeholders. SEPA's "Climate change allowances for flood risk assessment in land use planning"

12 Development should comply with SEPA's 'Flood Risk and Land Use Vulnerability Guidance' in relation to redevelopments

^{12 13} See SEPA's Land Use Vulnerability Guidance

14 Further buffer strip guidance can be found in Appendix 10: Standards for Open Space and Aberdeenshire Council's "Guidance for Developers: Buffer Strips Adjacent to Water Courses and Water Bodies"

~~13~~¹⁵ See Policy PR1.3 Protecting Resources

16 This is supported by Scottish Government's "Surface Water Management Planning Guidance (2018) and SEPAs Culverting of Watercourses – Position Statement and Supporting Guidance

Reason:

The current first sentence is ambiguous and could suggest a Flood Risk Assessment (FRA) wouldn't be required for land with a greater than 10% annual chance of flooding which is incorrect. If a site lies within the Indicative flood map extent, i.e. has a 0.5 (1:200) chance of flooding or greater, we would ask for a FRA to be submitted. This principle has taken forward to the developer requirements asked for in Appendix 7. As such the text **requires** amendment to clarify a FRA will be required for a development within an area with an indicative flood risk of 0.5% or greater.

With regards the second sentence, the commonly adopted definition across Scotland for an area with a lower risk of flooding (i.e. within the low to medium category) is somewhere that would be impacted by an event with a return period of between 1-in-1,000 years and 1-in-200 years (i.e. 0.1% AEP to 0.5% AEP). Indeed, the Strategic Flood Risk Assessment that accompanies this proposed LDP refers to this annual exceedance probability (0.1% AEP to 0.5% AEP), as well as paragraph C4.4 of this policy - referring to lower flood risk as 0.1% AEP (1-in-1,000 years). To our knowledge, no public body in Scotland actively refers to a 1-in-400 years return period (i.e. 0.25% AEP) and as there is no publicly available indicative national mapping of the 0.25% AEP floodplain published we are unclear how a developer would be able to ascertain whether their site lies within such an area. Therefore, we **request** the Aberdeenshire's Plan adopt the convention of other public bodies and amend the text to refer to an area of lower flood risk as that being within the extent of a 0.1% AEP to 0.5% AEP event.

In relation to C4.1, we **require** the addition text referring to increased vulnerability and the addition of a new footnote as there is currently no reference to redevelopment of existing buildings and the potential for increased vulnerability to flood risk in this policy nor any cross referencing of Policy C4 in other policies which allow redevelopment of buildings. Redevelopment is referred to in a number of other policies including town centre development, tourism and rural development. In these cases, development may not be able to avoid areas of existing flood risk, and so there must be policy provision to make clear that in most cases, redevelopment in flood risk areas must be for uses which are the same or less vulnerability to flooding as the existing/most recent use. It needs also needs to be highlighted that any change of use should comply with SEPAs *Land Use Vulnerability guidance*, as supported by Scottish Planning Policy (SPP) paragraph 263, with the additional footnote.

In addition, in the first bullet point we **recommend** the change from 'effect' to 'alleviate' as currently it is not clear what is meant. Our suggested modification will also make this bullet point more consistent with paragraph C4.5.

And in the second bullet point, we recommend the text is change to 'flood storage and conveyance function...' as conveyance is just as important as storage but more difficult to mitigate if impacted.

In relation to C4.2, we **require** the removal of the reference to residential development. Its inclusion indicates that this would be an acceptable approach to enabling residential development within medium to high flood risk areas, but it is not an acceptable approach in principle and would be contrary to Scottish Planning Policy, paragraph 263.

In relation to C4.3, we **strongly recommend** cross reference to the open space policy where wider multiple benefits of buffer strips are covered. They are a valuable addition to a number of aspects of the plan's aspirations including place making and active travel, so the links to the wider benefits should be made here. In addition, developments should avoid the natural river corridor to allow sufficient space for river processes and restoration. The floods of winter 2015/2016 demonstrated that rivers e.g. the River Dee, can be very dynamic and change course in extreme flood events as. As such, we have recommended an additional footnote here.

In relation to C4.4, we **strongly recommend** removal of 'local' as the evidence could be of any type. For example, it could be from more detailed modelling that becomes available or a new data set that is produced.

In relation to the addition to C4.7, culverts have a range of harmful and system wide impacts on the environment and can be the cause of localised flooding constricting the natural flow of a watercourse and cause long term maintenance problems. As such we **request** the inclusion of this additional paragraph which help reinforce not only this policy but other policies in the plan by protecting existing open water habitat and local amenity, and giving the opportunity to create green-blue infrastructure and better placemaking. This additional paragraph will help the Policy comply with Scottish Planning Policy paragraph 255.

In relation to footnotes 8 and 11, we **strongly recommend** removal of the reference to the 2019 version as it is regularly updated and the most recent version should always be used.

In relation to footnote 10, we **require** the removal of "natural variations" as it is not an accurate or appropriate description of the uncertainties and physical factors being accounted for.

In relation to footnote 11, we **require** this modification as the current footnote refers to the wrong SEPA document.

In relation to the new footnote 12, we **require** the addition of this footnote as there is currently no reference to redevelopment of existing buildings and the potential for increased vulnerability to flood risk in this policy nor any cross referencing of Policy C4 in other policies which allow redevelopment of buildings as noted above in the reason for our modification to C4.1. Consequently, the existing footnote 12 will require to be renumbered to 13.

In relation to the new footnote 14, we **strongly recommend** the addition of this footnote as noted above in the reason for our modification to C4.3.

New footnote 15 is **requested** to support the new C4.7 paragraph

SECTION 14 THE RESPONSIBILITIES OF DEVELOPERS

Policy RD1 Providing Suitable Services

Vehicle Charging Points

Whilst we welcome the addition of vehicle charging in RD1.1 and RD1.2, we are disappointed our previous recommendation to meet and go beyond the current minimum guidance of provision as set out in '*Land Use Planning & Development Control: Planning For Air Quality*' published by Environment Protection UK & The Institute of Air Quality Management. This document recommends at least 1 Electric Vehicle (EV) point per 10 dwellings and/or 1000m² of commercial floorspace.

Documents such as the "Electric vehicles: driving the transition" published by the House of Commons Business, Energy and Industrial Strategy Committee are pointing to, and setting targets of having a majority of ultra-low to no emission vehicles by 2030 and only "effectively no emission" vehicles by 2050, and the Scottish Government's target to remove the need for new petrol or diesel cars or vans on Scotland's Roads by 2032 we again question why Aberdeenshire is not trying to meet but also go beyond meeting these targets with a more ambitious policy.

Water and Waste Water RD1.9-RD1.15

Modification:

We request the following rewording of paragraph RD1.12. We confirm we will object to this policy if this modification is not undertaken:

"RD1.12 Where a connection...cost and practicability ~~show it to be a~~ **demonstrate there is no** reasonable alternative.

Reason:

To keep the Policy wording in line with our Policy and Supporting Guidance on Provision of Waste Water Drainage in Settlements WAT-PS-06-08, which is identified as a material planning consideration and supported by PAN 79 Water and Drainage.

As you are aware, private systems not adopted by Scottish Water, can cause considerable problems in Aberdeenshire, significantly impacting the environment and residents when not maintained properly in the long term. We would like to see some sort of binding maintenance agreement as a requirement where private sewerage is being approved and Scottish Water cannot/will not adopt. We would like to work with the Council to establish whether there is a planning mechanism to enable this. For example the following wording could be added to the above policy "and where cost and practicability show it to be a reasonable alternative **and where the developer commits to a maintenance agreement with homeowners for the lifetime of the plant where adoption by Scottish Water is either not sought or not granted.**" But we are unsure if this can be secured through a planning policy or not and seek your advice on this matter.

Waste Management Requirements RD1.16-RD1.17

Propose no further comment

Policy RD2 Developer Obligations

We are disappointed to note our recommended rewording has not been taken forward into the Plan. We recommend again the following modification:

Modification:

RD2.1: "Contributions will be sought towards the provision of the necessary infrastructure **and the protection, enhancement and promotion of environmental assets....**"

Reason:

We highlight to you The Scottish Borders Council Local Development Plan Policy IS2: Developer Contributions which we believe is well worded and this wording would assist delivery of the objectives of the Aberdeenshire LDP and we recommend Policy RD2 is reviewed in line with this.

APPENDIX 1 EMPLOYMENT LAND ALLOCATIONS

We have no comment on this Appendix 1 with any site specific concerns addressed in our comments under Appendix 7 and the general policies.

APPENDIX 2 RETAIL CENTRES

We have no comment on this Appendix 2 with any site specific concerns addressed in our comments under Appendix 7 and the general policies.

APPENDIX 3 REGENERATION PRORITY AREAS

Modification:

Should our requested rewording of Policy C4 (see above) in relation to change of use not be undertaken, we **request the cross referencing** to Policy C4 in some form in Appendix 3 to ensure development will only be acceptable where there is no increase in vulnerability to flood risk, highlighting that any conversion or new development must be in accordance with SEPA Flood Risk and Land Use Vulnerability Guidance as referenced by Scottish Planning Policy.

Reason:

Whilst we welcome the restoration of/conversion of existing buildings, this has the potential to introduce increased vulnerable uses to a site particularly in terms of overnight accommodation, We are happy to discuss this issue in more detail in order to ensure wording that supports the Council's ambitions for economic development is also cognisant of the issues with regard to flood risk and particular use types.

APPENDIX 4 BOUNDARIES OF THE GREENBELT

We have no comment on Appendix 4

APPENDIX 5 COASTAL ZONE

We have no comment on Appendix 5

APPENDIX 6 HOUSING ALLOCATIONS

We have no comment on this Appendix 6 with any site specific concerns addressed in our comments under Appendix 7 and the general policies.

APPENDIX 7a-f SETTLEMENT STATEMENTS

Please see our detailed comments for the Settlement Statements and proposed allocations in Appendix 2 of this letter.

APPENDIX 8 SUCCESSFUL PLACEMAKING DESIGN GUIDANCE

We welcome the inclusion of this appendix. Although brief, we acknowledge many of our interests, are covered in the table and particularly welcome the references to flooding and flood resilience. However, we recommend the following issues are added to the relevant columns:

Safe and pleasant:

- Connection to public water and waste water infrastructure

Resource Efficient:

- The use of water saving technologies (to support the 'Gold' standard required in Policy C1)
- The installation of district heating (this could maybe be added to the Low carbon design box)
- Use of renewable energies is emphasised

We also recommend reference to the Building for Nature qualitative benchmark within this appendix. The benchmark requires the consideration of standards relating to water, wellbeing and wildlife in a spatial context in terms of what they contribute to that place and wider connectivity. All standards are considered in the context of their contribution to climate change. The benchmark is commonly applied in respect of residential commercial and mixed development, supporting Planning Authorities in answering "What would good GI look like, in these circumstances, on this site? ". "What value could potentially be added?" The scheme offers reassurance to Planning Authorities that comprehensive consideration has been given to these aspects of the development. Developer feedback has indicated Building with Nature significantly reduces planning uncertainty by facilitating them in achieving many of the place-led objectives Planning Authorities require of them. Accreditation can be applied by Planning Authorities re policy making (see West Dunbartonshire Local Development Plan 2) and by the development industry in respect of individual developments bringing obvious marketing benefits.

Masterplanning

We note that the requirement for a Masterplan or Design Framework has been identified in the Settlement Statements and is also identified in the Proposed Delivery Programme. Masterplanning is key in the process of successful Placemaking and should therefore include from the outset, all

parties with an interest in the site. Whilst each settlement text tries to set out the developer requirements, these do not always give the developer a clear understanding of the sites constraints and opportunities. Going forward, we would welcome the opportunity to work with the Council on providing more comprehensive Masterplan/Placemaking brief for each of the masterplan/design framework sites, with priority given to those which have no masterplan/design framework at present. However, we also recommend this process is undertaken for sites which have historical masterplans/design frameworks which have not yet come forward for development. We advise that a requirement be included for individual planning applications coming forward within a masterplan area to demonstrate how they integrate with and assist delivery of the masterplan as a whole. We have had unfortunately experience of the masterplan process and placemaking being jeopardised by individual applications being submitted in isolation.

APPENDIX 9 BUILDING DESIGN GUIDANCE

We welcome the reference to flood risk and flood resilience in this appendix. All too often resilience is seen as an attempt to justify unacceptable building in flood risk areas but we welcome that the wording in this appendix counters that.

Modification:

We **request** the following rewording in the table on page 883, middle column, second sentence, and the addition of a footnote:

“Where a private water supply or drainage arrangement are ~~required~~ **proposed**, all technical information **and reasons for not connecting to a public water/sewer, as well as details of adoption agreements with Scottish Water or lifetime maintenance proposals** should be provided¹”

¹ Please refer to SEPAs ‘*Planning Advice on Waste Water Drainage*’ (Land Use Planning System Guidance Note 19) for guidance on technical information requirements

Reason:

To provide transparency to developers about what further information will be required to support any proposal for private drainage which will require to be compliant with our ‘*Planning Advice on Waste Water Drainage*’ (Land Use Planning System Guidance Note 19), supported by PAN 79 Water and Drainage

APPENDIX 10 STANDARDS FOR OPEN SPACE

Modification:

Whilst we welcome Appendix 10, our main observation is the lack of reference to placemaking here and **strongly recommend**, in order to support one of the main aims of the Plan and Appendix 8 that Placemaking is referred to in Appendix 10. We suggest the following wording to be included as an over-arching consideration above the table:

“The inclusion and design of open space provides a key opportunity for Placemaking where people are at the heart of new and existing development and multiple outcomes are achieved e.g. biodiversity and wellbeing.”

Reason:

The inclusion and design, and therefore the standards, of open space is integral to successful Placemaking.

Modification:

We welcome the reference to the range of benefits buffer strips provide and the inclusion of the footnote to ‘*Guidance for Developers: Buffer Strips Adjacent to Water Courses and Water Bodies*’ which gives more detailed guidance on buffer strip requirements. However, we request the following minor rewording to the first and last bullet points in the notes column for Green-Blue Networks:

- ~~Minimum 6m strip may be increased where banks are sloping~~ **Widths may require to be wider as a result of local factors such as hydro-geomorphology, need for pollution control, native species habitats or active travel provision. They may be wider than 20m on major rivers or dynamic water courses to allow them to follow their natural course** (first bullet point)
- **Play an important role in...permitting access for long term maintenance and river restoration** (last bullet point).

Reason:

The current wording for the first bullet point isn't clear as most natural river banks are sloping. It needs to be emphasised that buffer strips will need to be assessed on a site by site, watercourse by watercourse basis. It therefore needs to be made clear that 6m is the minimum and this may increase due to local factors. Construction within the natural river corridor should not take place to allow a river to follow its natural course and this may be wider than the quoted buffer strips, even those quoted for the large watercourses.

The additional wording to last bullet point will help the Plan support the implementation of Scotland's River Basin Management Plan and restoration of other non-classified waterbodies to their natural state.

Modification:

Whilst we welcome the inclusion of burial grounds as functional greenspace we request the additional reference to our guidance as a footnote in this appendix.

(Notes column, second sentence) "...ground testing²...."

² **Ground testing shall be in accordance with SEPA's *Guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32)***

Reason:

Cemeteries can have a detrimental impact on groundwater. Their acceptability, including the potential location and scale of development at a site, can only be assessed following intrusive ground investigation as stated in this appendix. In order for the developer obligations to be transparent reference should be made to the extent of what ground investigations will be required as there is no reference to our LUPS GU32 elsewhere in the plan. The addition of this text will also the developer requirements for burial site allocations we have highlighted in Appendix 7.

APPENDIX 11 CONSERVATION AREAS

We have no comment on Appendix 11

APPENDIX 12 Parts 1-4 LOCAL NATURE CONSERVATION SITES

We have no comment on Appendix 12

APPENDIX 13 ABERDEENSHIRE SPECIAL LANDSCAPE AREAS

We have no comment on Appendix 13

APPENDIX 14 AREAS SAFEGUARDED OR IDENTIFIED AS AREAS OF SEARCH FOR MINERAL DEVELOPMENTS

We have no comment on Appendix 14

APPENDIX 15 RECYCLING AND WASTE FACILITIES

We support the inclusion and content of this appendix. It sets out the clear expectations Aberdeenshire Council have and how these can be met.

GLOSSARY

Buffer Strips

Modification requested:

“...adjacent to a ~~watercourse~~ **waterbody**...”

Reason:

Buffer strips are required for all water bodies not just watercourses and for consistency/compliance with Appendix 10 wording.

Freeboard

Modification requested:

~~“The allowance made for natural variations in flood levels~~ **A factor of safety in flood protection design (usually expressed as height above flood level), which allows for factors related to the uncertainty in estimating flood risk (e.g. wave action, settlement, morphological changes).”**

Reason:

Accuracy of definition

Infrastructure

Modification requested:

“...roads and transport facilities, **energy and communication networks**, sewage and water facilities.”

Reason:

Infrastructure is far more wide ranging for example, overhead and underground pipelines and electricity cables and associated substation infrastructure should be included in this definition.

PCS170943 APPENDIX 2: SEPA COMMENTS ON ABERDEENSHORE PROPOSED PLAN 2020 – APPENDICES 7a-7f - SETTLEMENT STATEMENT & ALLOCATION TEXT

1. General

- 1.1 We are pleased to see that much of our previous advice on the draft proposed settlement statements has been incorporated. We particularly welcome the removal/non-inclusion of the preferred and alternative sites that were significantly at risk of flooding.
- 1.2 However, after reviewing the Proposed Plan (hereinafter referred to as the Plan) and our previous comments, we have highlighted in the following table where we request minor modifications to the settlement or individual allocation text to ensure we can fully support all the settlement statement and allocations. We confirm these modifications (except for those relating to the allocations listed in section 2 below) do not change our overall position on each of allocations and trust these can be dealt with as minor modifications to the Proposed Plan.
- 1.3 Many of our requests or recommendations for modifications are due to inconsistencies in wording used between the appendices for different Council areas. We presume this is due to different officers writing these. Whilst we have tried to provide consistency through the requested/recommended modifications, we recommend a consistency check is undertaken prior to the Adopted Plan being published.

2. Flood risk

2.1 General flood risk comments

- 2.1.1 Overall we are very supportive of the approach taken to flood risk in the Plan. Most of the advice we provided at earlier Plan stages has been taken on board and has helped to ensure that there is some certainty for developers and communities in delivering the development planned for, and ensures that any site constraints are identified and understood early in the planning process. We welcome that the Plan has been supported by a comprehensive Strategic Flood Risk Assessment (SFRA).
- 2.1.2 We particularly support the use of protected land to ensure that land which functions as flood plain for rivers and watercourses is protected from inappropriate development. This ensures that communities have greater resilience to climate change, but also ensures the land continues to serve as blue/green space within communities, providing amenity and habitat and supporting the health of places.
- 2.1.3 We support the development requirement for a Flood Risk Assessment (FRA) to be undertaken prior to development occurring for many of the sites allocated in the Plan. The inclusion of an FRA as a site specific development requirement will ensure that flood risk is appropriately considered and directed away from medium to high flood risk areas (unless it accords with the risk framework in paragraph 263 of SPP). It will also ensure that developers are fully informed of the potential flood risk issues affecting the site that may constrain the developable area. We

have recommended modifications to the Plan text in the table below where a FRA is definitely required in relation to our interests and trust that this rewording can be dealt with as minor modifications.

2.2 Allocations – Potential Objections to inclusion in the Plan due to flood risk

2.2.1 Tipperty OP2 (Formartine)

This is the only site in the Plan which we will object to being included in the Plan in its current form unless our concerns below are addressed before it is included in the finalised Plan. We highlighted previously (at Bid consultation stage and MIR stage) that we would not support this allocation in the Plan unless a flood risk assessment (FRA) was carried out prior to it being included in the Plan, to demonstrate that it was an appropriate site for development. No FRA has been provided. The SEPA Flood Indicative Map indicates that the site is at significant risk of flooding with at least half of the site being part of the functional floodplain of the Tarty Burn and so development of the site would be contrary to Scottish Planning Policy. In addition to development on this site being at risk of flooding, it could also increase flood risk to nearby areas. We note the Plan states that access to the site would be from the A90 through the western end of the site. This part of the site is floodplain. Construction of an access road here is likely to reduce the capacity of the floodplain and it may not be possible to provide safe access and egress from this location.

2.2.2 We therefore object to this site being allocated in the Plan in its current form. In order to address our objection, either:

(a) the site should be removed from the Plan;

(b) The site boundary should be amended to exclude the areas expected to flood, and the requirement to take access through the floodplain should be removed; or

(c) a detailed FRA should be submitted in support of the site prior to it being allocated (allowing sufficient time for a review and validation of the assessment).

2.2.3 In addition to flood risk, approximately 50% of the site lies within the natural river corridor of the Tarty Burn which is currently at bad status (ID23205) in the River Basin Management Plan due to poor hydromorphology. Any development within this corridor would further inhibit the Burn from taking its natural course in the long term and therefore we would object to any development proposal which did not include the natural river corridor within the buffer required for this watercourse. As such access from the A90 south of Newark Cottage is unlikely to be appropriate.

2.2.4 If your authority allocates this site contrary to the above advice, it should be accepted by the Council that the findings of a future FRA may confirm that the site is not suitable for development. We therefore reserve our right to object to the principle of development on this site at the planning application stage.

2.3 Allocations – Potential Objections to the Plan text in relation to flood risk

2.3.1 A significant proportion of the following sites lie within the functional flood plain and are known to be at risk from flooding. We therefore require that a development requirement is attached to these sites for a Flood Risk Assessment to be undertaken prior to any development occurring

on the site and that the findings are used to inform the scale, layout and form of development. This is necessary to ensure that development is avoided within areas at medium to high risk (unless they accord with the risk framework in paragraph 263 of SPP) and there is safe dry pedestrian access and egress at times of flood. It should be accepted by the Council and developers that the capacity of these sites to provide deliverable development land may be reduced due to flood risk.

2.3.2 Auchnagatt OP1 (Buchan)

We do not object to the allocation Auchnagatt OP1 being allocated in the Plan provided the allocation wording is significantly altered to convey the scale of flood risk at the site which will be a major constraint in proportion to the size of the site. The SEPA Flood Maps indicate that 30% of the site is at risk of flooding from the Ebrie Burn, in addition to there being a small watercourse along the boundary of the site which has caused flooding to nearby houses in the past. Given the significant flood risk information for the site, we think it could be a significant constraint on the potential capacity and layout of the site, and that is not reflected in either the allocation or settlement text at present. A FRA will be required to support any development at the site, and it will have to assess risk from both the Ebrie Burn and the small watercourse. As such we have requested in our detailed comments below that this is highlighted in the allocation text. We will **object** to this allocation if the requested text is not added to the Plan.

2.3.3 Peterhead OP6 (Buchan)

The SEPA Indicative Flood Map shows a significant portion of this site to be at flood risk from the watercourse running through the site and the P4 area is unlikely to be of sufficient width to eliminate this flood risk. As such we have requested in our detailed comments below that this is highlighted in the allocation text. We will **object** to this allocation if the requested text is not added to the Plan.

2.3.4 Pitmedden OP3 and R1 (Formartine)

We commented at Bid stage that an FRA would be required depending on the proposed development layout on these sites. As such we have requested in our detailed comments below that this potential flood risk is highlighted in the allocation text. We will **object** to this allocation if the requested text is not added to the Plan.

2.3.5 Insch OP1 (Garioch)

We would like to highlight significant concerns to the inclusion of this site in the Plan. In light of the recent flood study undertaken on behalf of Aberdeenshire Council, the Council will need to consider the long term resilience of the community of Insch to flooding and climate change, and the role of these sites in the future. We request further consultation is undertaken with your flood risk colleagues in this respect. We acknowledge that OP1 has extant planning permission, but the detailed flood study has improved understanding of flood risk in the area and concluded that the site is at higher risk than was presented in the developer's FRA. If the planning permission lapses, it should be noted we would be unlikely to support a renewal of this application or a new planning application on this site and have requested this is highlighted within this allocation text. We will **object** to this allocation if the requested text is not added to the Plan.

2.3.6 R4 (Garioch)

Site R4 is for an extension of the existing hospital. Again, the recent flood study for Insch has shown that both the existing hospital and the site for the extension are at high risk of flooding and this risk will increase in future due to the effects of climate change. Unless flood prevention

measures are going to be brought forward to give long term protection to the existing community of Inch, then a relocation of the hospital may be a more sustainable approach in the long term.

2.3.7 However, given this allocation relates to an existing development (the hospital) we do not object to its inclusion in the Plan but we will require any development on this site to demonstrate it will not increase flood risk to neighbouring properties and be constructed to be flood resistant. As such we have requested in our detailed comments below that this is highlighted in the allocation text. We will **object** to this allocation if the requested text is not added to the Plan.

2.3.8 Kemnay OP1 (Garioch)

As it was proposed to remove this site from the LDP at MIR stage we did not provide detailed comment on it but supported its removal. Flooding records show a significant portion of the site OP1 to be at fluvial flood risk from the River Don and from a small watercourse on its southern boundary. A Flood Risk Assessment will be required. As such we have requested in our detailed comments below that this is highlighted in the allocation text. We will **object** to this allocation if the requested text is not added to the Plan.

2.4 Flood risk caveats

2.4.1 In relation to business and employment sites, we have provided flood risk comments with consideration that it would be unlikely that there would be any uses taking place on site that we would categorise as “most” or “highly” vulnerable. Complementary uses to business, such as a day nursery, may not be suitable in flood risk terms on the same site allocation as an office building for example. Please also refer to our comments relating to the polices in Section 6 of the Plan in Appendix 1 of this letter.

2.4.2 The sites have been assessed against the SEPA Indicative Flood Maps. The Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are *indicative* and designed to be used as a strategic tool to assess flood risk at the community level and to support planning policy and flood risk management in Scotland.

3. Waste water drainage

3.1 We note and welcome the additional drainage infrastructure text added as bullet points to the majority of the settlement statements. However, we note that there is no confirmation of the status of waste water drainage in a small number of settlement statements. We have highlighted these in the table below and request for consistency that these are included in the Plan to give developers more transparency regarding any potential development constraints.

3.2 Unfortunately, as highlighted in our response to the MIR, there are a number of settlements where the existing waste water treatment plants serving the existing settlements are at capacity and, at present, a technical solution to a growth project in these settlements is still being investigated to overcome the problems of there being little dilution capacity in the receiving waters. These growth projects cannot be confirmed until a technical solution is found, and we cannot advise on the timescales for this at present due to this physical problem that requires to be

overcome. **We therefore must highlight that development during the Plan period may be limited in Oldmeldrum, Newmachar, and Kingseat.** Similarly, **the OP2 site at Memsie and any future development on the north side of the village may be limited during the Plan period** due to there being no further dilution capacity in the receiving waters to take further private waste water treatment. We have requested that these potential development restrictions are more clearly highlighted in the settlement drainage text and we will **object** to the Plan in this regard if these text modifications as set out in the table below are not undertaken.

- 3.3 We will continue to work with Scottish Water and yourselves help identify suitable technical solutions to overcome these waste water drainage issues within the Plan period.

4. Peat

- 4.1 We are pleased to confirm that peat and carbon rich soils have been largely avoided in the allocation of sites. There are only a small number of allocations where a significant proportion of the site (more than 50%) appears to be underlain with peat. Where this is the case we have requested the need for a Peat survey is added as a developer requirement to the allocation text. We will **object** to the following allocations if the requested text is not added to the Plan: Durris Forest R1, Oldmeldrum OP5 and Portlethen OP4)

5. Cemeteries

- 5.1 There are a number of allocations identified as sites for cemeteries some of which we have not been consulted on previously. Cemeteries can have a detrimental impact on groundwater. Their acceptability, including the potential location and scale of development at a site, can be assessed only following intrusive ground investigation. In the absence of such information, we reserve our position on the acceptability of these allocations. Should investigations be carried out prior to Plan adoption, in accordance with our *Guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32)*, then we would be pleased to review our position.
- 5.2 If no further information is provided prior to Plan adoption, we have requested in the table below that a requirement be attached to the site requiring intrusive ground investigation, to be undertaken in line with our *Guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32)*, before any development occurs at the site. **We wish to highlight that the findings of the investigation may indicate that the site is not suitable for a cemetery due to an unavoidable impact on groundwater.**
- 4.3 Most of the cemetery sites proposed appear to lie on glacial till superficial deposits and metamorphic or intrusive igneous bedrock. At some sites however, moderate to high permeability superficial deposits are mapped. **The proposed sites for cemetery extensions at Banchory, Old Deer, Rathen and Torphins lie on sands and gravels. No superficial deposits are mapped for the Banff site,** so any superficial deposits that exist are likely to be less than 1 m in thickness. Where superficial deposits are thin, absent, or consist of granular materials with high infiltration capacity and hydraulic conductivity, the capability of the unsaturated zone for attenuation of contaminants will be reduced. **In these circumstances ground conditions may not be suitable for cemetery development.** In addition, at Banchory, Old Deer and Torphins there are surface water receptors which could potentially be impacted by cemetery developments. The watercourses are likely to be in hydraulic continuity with the superficial aquifer. Potential may exist for pollution of the burns due to cemetery development at the sites.

However, a more detailed assessment will need site investigations and a water features survey to confirm the above initial findings and we have requested this developer requirement be highlighted in the Plan text in the table below. We will **object** to these allocations if the requested text is not added to the Plan.

- 4.4 We confirm there are no registered licensed water abstractions near the proposed sites (other than Ellon which has previously been reviewed by ourselves) but the Drinking Water Quality Regulator records show private water supplies (PWS) near the Banff, Fraserburgh and Drumoak sites. Our *Groundwater Protection Policy* recommends that cemeteries should not be sited within 250m of any spring, well or borehole used as a source of drinking water, or within 50m of any other spring, well or borehole. Therefore a site investigation and water features survey will be required. Again, we have requested this requirement be highlighted in the Plan text in the table below. We will **object** to these allocations if the requested text is not added to the Plan.
- 4.5 Please note the protection of groundwater accords with the objectives of the Water Framework Directive and your associated duties as a responsible authority under the Water and Environment and Water Services (Scotland) Act 2003. These duties are reflected in paragraph 194 of Scottish Planning Policy which states that the planning system should promote the protection and improvement of the water environment, including rivers, lochs, estuaries, wetlands, coastal waters and groundwater, in a sustainable and co-ordinated way.

5. Co-location of sites to regulated processes

- 5.1 The allocation site **Cairnie OP1** is located adjacent to a sewage treatment works which is regulated by SEPA under a Controlled Activities Regulations (CAR) Licence. Residual emissions can occur on sites despite being compliant with regulations controlled by SEPA. We highlighted at the MIR stage that the proximity to the existing sewage works may cause odour issues and that your environmental health colleagues should advise on a suitable buffer width for the site. However, there appears to be no mention of a buffer requirement in the allocation text. We have therefore recommended the addition of a requirement in the allocation text to provide a suitable buffer from the sewage works on the eastern side of the site.

6. Radioactive contamination

- 6.1 We welcome the developer requirement for a specialist ground contamination investigation on radioactive substances. There are two other sites allocated in the Plan, Longside Airfield OP1 (Buchan) and Fordoun BUS2 (Kincardine and Mearns) which were former military airfields. Given their former use, radium 226 may be present due to its use in aircraft dials during WWII. We have therefore requested a requirement in each allocation text stating an assessment of the site for potential radioactive substances is required prior any development. We will **object** to these allocations if the requested text is not added to the Plan.

BANFF & BUCHAN

PROPOSED PLAN ALLOCATION	PROPOSAL	SEPA REVIEW AND REQUESTED MITIGATION/DEVELOPER REQUIREMENT
ABERCHIRDER <u>Flood risk bullet point:</u> We recommend removal of P3 from this bullet point and the following rewording: “Due to the presence of a watercourse on its eastern edge, a Flood Risk Assessment may be required for the BUS site. A buffer strip will be required adjacent to the watercourse which should be integrated positively into the development” <u>Strategic drainage bullet point:</u> No comment		
BUS	Business	See above
BANFF <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> No comment		
OP1: Goldenknowes	Mixed use, 400 homes	No SEPA issues with allocation text
OP2: Colleonard Road	200 homes	No SEPA issues with allocation text
R1	Cemetery	Due to the underlying geology and presence of a possible private water supply within 250m of this site, we request the following text is added to the allocation text or as a separate bullet point: “A detailed groundwater assessment and water features survey will be required to fully assess the suitability of this site as a cemetery.”
CAIRNBULG & INVERALLOCHY <u>Flood risk bullet point:</u> We recommend rewording of this bullet point with a separate bullet for flood risk issues relevant to the settlement as a whole and those relevant to OP1 in a separate one. We suggest the following wording: <ul style="list-style-type: none"> • Parts of the settlement are at risk from coastal flooding. Flood Risk Assessments maybe required. • A Flood Risk Assessment will be required for OP1 due to the risk of surface water flooding. <u>Strategic drainage bullet point:</u> No comment		
OP1: South of Allochy Road,	85 Homes	No SEPA issues with allocation text
OP2: Westhaven	43 homes	No SEPA issues with allocation text
OP3: Land North Rathen Road	30 homes	We note the SFRA identifies surface water as a possible issue for this site but we confirm SEPA has no requirements for this site

CORNHILL <u>Flood risk bullet point:</u> We request rewording of this bullet point to the following: <ul style="list-style-type: none"> • There is a risk of flooding from a small watercourse and fields adjacent to OP1 and OP2. A Flood Risk Assessment will be required. <u>Strategic drainage bullet point:</u> No comment		
OP1: Midtown	8 homes	No SEPA issues with allocation text
OP2: Land West of Midtown	63 homes	No SEPA issues with allocation text
CROVIE <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> We request the addition of a Strategic drainage bullet point in the settlement text, for consistency, with the following wording: “There is no public waste water infrastructure available.”		
CRUDIE <u>Flood risk bullet point:</u> n/a <u>Strategic drainage bullet point:</u> No comment		
OP1: Land at Hawthorn Croft	10 homes	No SEPA issues with allocation text
OP2: Hawthorn Crescent	9 homes	No SEPA issues with allocation text
FORDYCE <u>Flood risk bullet point:</u> We recommend the addition of the following bullet point: <ul style="list-style-type: none"> • Parts of Fordyce are at risk of flooding from the Burn of Fordyce. Flood Risk Assessments may be required. <u>Strategic drainage bullet point:</u> All development in this settlement will be required to connect to the waste water network. Therefore, for consistency, we request a drainage bullet point is added to this settlement text. It should be confirmed with Scottish Water that the proposed population growth is within the design criteria for the existing waste water infrastructure and, if so, this is confirmed in the strategic drainage bullet point or, if not, the need for an infrastructure upgrade must be highlighted.		
OP1: West Church Street	5 homes	No SEPA issues with allocation text
FRASERBURGH <u>Flood risk bullet point:</u> We request the following minor rewording to the second bullet point, last sentence: “ ... buffer strip may will be required...” <u>Strategic drainage bullet point:</u> No comment		
OP1: Kirkton Development	600 homes/ Health centre	Although we have been consulted on this site before we have not been consulted on the cemetery land use aspect. Due to presence of a possible private water supply within 250m of this site and a well in the western part of the site, we request the following text is added to the

	/cemetery	allocation text or as a separate bullet point: “A detailed groundwater assessment and water features survey will be required to fully assess the suitability of this site as a cemetery.”
OP2: Land to W of Boothby Rd	590 homes and pitches	We recommend minor rewording to the last paragraph due to boundary change from MIR to Proposed Plan stage - "A buffer strip will be required alongside the watercourse on the northern boundary running through the site...."
OP3: Phingask	Employment	No SEPA issues with allocation text
OP4: Land at Tyronehill Farm	30 homes	We request it is highlighted in the allocation text that this site will be required to connect to the public waste water sewer – suggested wording: “Connection to the public waste water network will be required for this site.”
OP5: Land to East of Phingask	Employment	No SEPA issues with allocation text
OP6: Land within Kirkton	Employment	No SEPA issues with allocation text
CC1 (no shape file)	Retail/ storage	No SEPA issues with allocation text
R1	Recreation	No SEPA issues with allocation text
R2	Healthcare	No SEPA issues with allocation text
BUS1	Business	No SEPA issues with allocation text although we note the SFRA identifies flood risk issues which are due to small watercourses and/or surface water which your flood risk colleagues may wish to address through SUDS or other measures.
BUS2	Business	No SEPA issues with allocation text although we note the SFRA identifies flood risk issues which are due to small watercourses and/or surface water which your flood risk colleagues may wish to address through SUDS or other measures.
BUS3	Business	No SEPA issues with allocation text although we note the SFRA identifies flood risk issues which are due to small watercourses and/or surface water which your flood risk colleagues may wish to address through SUDS or other measures.
BUS4	Business	No SEPA issues with allocation text although we note the SFRA identifies flood risk issues which are due to small watercourses and/or surface water which your flood risk colleagues may wish to address through SUDS or other measures.
GARDENSTOWN Flood risk bullet point: no comment Strategic drainage bullet point: No comment		
OP1: Braegowan	25 homes	No SEPA issues with allocation text
OP2: Bracoden/ Knowhead	11 homes	No SEPA issues with allocation text
INVERBOYNDIE Flood risk bullet point: no comment Strategic drainage bullet point: All development in this settlement will be required to connect to the waste water network. Therefore, for consistency, we request a drainage		

bullet point is added to this settlement text. It should be confirmed with Scottish Water that the proposed population growth is within the design criteria for the existing waste water infrastructure and, if so, this is confirmed in the strategic drainage bullet point or, if not, the need for an upgrade must be highlighted.		
BUS	Business	No SEPA issues with allocation text
LADYSBRIDGE <u>Flood risk bullet point:</u> n/a <u>Strategic drainage bullet point:</u> We request the following text is added to this bullet point for the avoidance of doubt: “All development will be required to connect to the public waste water network”		
OP1: Phase 5 Ladysbridge	35 homes	No SEPA issues with allocation text
MACDUFF <u>Flood risk bullet point:</u> no comment <u>Strategic drainage bullet point:</u> No comment		
OP1: Land South of Corskie Drive	22 homes	No SEPA issues with allocation text
BUS	Commercial	No SEPA issues with allocation text
MEMSIE <u>Flood risk bullet point:</u> Confirm with Council FPU whether FRA for OP2 still required (see comment below) and include R1 (see comment below) <u>Strategic drainage bullet point:</u> We request the following rewording of this bullet point as discharge from the OP2 site to the Private WWTW unlikely to be technically feasible (or highly challenging) due to the limited flows in the receiving watercourse. The licence would need a variation from SEPA which we may not be able to authorise. <ul style="list-style-type: none"> There is insufficient capacity at Memsie Cairn Stone septic tank...The development at Westcroft Close is currently served by a private treatment plant which has not yet been taken over adopted by Scottish Water. This treatment plant is expected to serve OP2. Due to limited flows in the receiving watercourse for this treatment plant, additional private treatment for OP2 site may not be possible. Until a growth project can be implemented for the whole settlement, development during the Plan period may be limited at this site. We also request the removal of the fourth and fifth sentences in the general settlement statement which refer to the drainage constraints. With the rewording of the strategic drainage point these sentences are not required and do not add clarity to the drainage constraints in the village.		
OP1: Crossroads	15 homes	We request the last sentence in the last paragraph of the allocation text is removed as it is not relevant - private drainage will not be acceptable at this location.
OP2: Land North of Cairn Close	20 homes	Flood risk: The OP2 boundary has been modified since the MIR consultation and is further from the watercourse to the north. Although SEPA does not now require an FRA for this site, we recommend the Council’s FPU should confirm whether the requirement for a FRA still remains or whether can be removed from the allocation text. Drainage: With regards to our comments above in relation to the strategic drainage bullet point, we request the last paragraph in the allocation text is removed and replaced with: “Due to limited flows in the receiving watercourse for this treatment plant, additional private treatment for OP2 site is unlikely to be feasible. Until a growth project can be implemented for the whole settlement, development during the Plan period may be limited at this site. Early discussions with Scottish Water should take place in this regard.”
R1	Education or	We request the following text is added to the allocation text box or as a separate flood risk bullet point:

	community	"The site is adjacent to the 1:200 fluvial extent of the Water of Philorth. A FRA may be required."
NEW ABERDOUR		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1	48 Homes	No SEPA issues with allocation text
NEW BYTH		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: Former School	12 homes	No SEPA issues with allocation text
PENNAN		
Flood risk bullet point: No comment		
Strategic drainage bullet point: We request the addition of a strategic drainage bullet point in the settlement text for consistency and request Scottish water confirm the capacity of its infrastructure in this settlement and wording of the bullet point is agreed accordingly.		
PORTSOY		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: Target road	10 homes	No SEPA issues with allocation text
OP2: Depot Park Road	6 homes	No SEPA issues with allocation text
OP3: Former Hospital	44 homes	No SEPA issues with allocation text
RATHEN		
Flood risk bullet point: No comment		
Strategic drainage bullet point: We request the first sentence of this bullet point is replace by the following: "There is no public waste water infrastructure in Rathen. Rathen lies with a SEPA Waste Water Drainage Consultation Area; SEPA will require full site investigations for all private waste water proposals. "		
OP1: Bridge of Rathen	10 homes	No SEPA issues with allocation text
R1	Cemetery	We request the following text is added to the allocation text: "A groundwater assessment will be required to assess the hydraulic connectivity of the site with the Water of Philorth/Water of Tyrie"
ROSEHEARTY		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: South of	49 homes/	No SEPA issues with allocation text

Ritchie Road	business	
OP2: Murison Drive	10 homes	No SEPA issues with allocation text
OP3: Cairnhill Road	10 homes	No SEPA issues with allocation text
SANDEND		
<p><u>Flood risk bullet point:</u> No comment</p> <p><u>Strategic drainage bullet point:</u> All development in this settlement will be required to connect to the waste water network. Therefore, for consistency, we request a drainage bullet point is added to this settlement text. It should be confirmed with Scottish Water that the proposed population growth is within the design criteria for the existing waste water infrastructure and, if so, this is confirmed in the strategic drainage bullet point or, if not, the need for an upgrade must be highlighted.</p>		
OP1: Rear of Seaview	8 homes	Flood risk: We recommend the deletion of the last sentence in the first paragraph (requirement is repeated in second paragraph) and the following text added to the last sentence of the second paragraph, for clarity: “...Flood Risk Assessment, due to overland runoff , must...”
SANDHAVEN AND PITTULIE		
<p><u>Flood risk bullet point:</u> No comment</p> <p><u>Strategic drainage bullet point:</u> No comment</p>		
OP1: St Magnus Road	31 homes	No SEPA issues with allocation text
WHITEHILLS		
<p><u>Flood risk bullet point:</u> No comment</p> <p><u>Strategic drainage bullet point:</u> All development in this settlement will be required to connect to the waste water network. Therefore, for consistency, we request a drainage bullet point is added to this settlement text. It should be confirmed with Scottish Water that the proposed population growth is within the design criteria for the existing waste water infrastructure and, if so, this is confirmed in the strategic drainage bullet point or, if not, the need for an upgrade must be highlighted.</p>		
OP1: Knock Street	30 homes	No SEPA issues with allocation text

BUCHAN

PROPOSED PLAN ALLOCATION REFERENCE	PROPOSAL	SEPA REVIEW AND REQUESTED MITIGATION/DEVELOPER REQUIREMENT
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ARDALLIE

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1: Land at Nether Backhill	10 homes/employment	No SEPA issues with allocation text
R1	SUDS for OP1	No SEPA issues with allocation text

AUCHNAGATT

Flood risk Bullet point: We **request**, for consistency, the following separate flood risk bullet point is added to the settlement statement text:

- **A significant proportion of site OP1 lies within SEPA's Indicative 1:200 flood risk area and has a small watercourse adjacent to it. A Flood Risk Assessment will be required for OP1 and its associates SUDS scheme on site R1.**

Strategic drainage bullet point: We **recommend** the following rewording of the first sentence: **"The existing waste water treatment plant is at capacity."**

OP1: Land at North of Braemo	16 homes/employment	Flood risk: Whilst the SFRA identifies flooding for this site, the wording implies SUDS and a buffer will mitigate this flood risk. However, we highlighted earlier in the Plan consultation process that this site was at significant fluvial flood risk but that we would not object to this site being included in the Plan if a FRA was undertaken to assess this fluvial flooding that is likely to affect the site. We therefore reiterate we will not object to this site being allocated in the Plan if the allocation wording is significantly altered to convey the scale of flood risk at the site which will be a major constraint in proportion to the size of the site. A such, we request the fourth sentence in the second paragraph is replaced with the following: "The SEPA Indicative Flood Maps show 30% of the site is at risk of flooding from the Ebrie Burn. In addition, the small watercourse along the northeast boundary of the site has caused flooding to nearby houses in the past. A Flood Risk Assessment will be required to determine the capacity of this site and the site layout options. Any areas of the site found to be at risk of flooding will not be suitable for any development and will be required to be retained as greenspace which should be integrated with the development as amenity land and a blue/green corridor. SUDS for the site should be provided on reserved land to the southeast (R1)"
OP2: Land at Annochie Place	32 homes	No SEPA issues with allocation text
R1	OP1 SUDS	We request the addition of this site in the separate flood risk bullet point as requested above.

BODDAM

Flood risk bullet point: For consistency in wording and layout, we **request** the existing bullet point is replaced with:

- **Parts of Boddam are in an area potentially vulnerable to flooding by the National Flood Risk Assessment. Parts of the settlement may be at risk from coastal flooding. Flood risk assessments may be required**
- **There is a high possibility of land drainage flooding occurring on site OP1. A Flood Risk Assessment may be required.**

Strategic drainage bullet point: No comment

OP1: East of Inchmore Gdns	9 homes	No SEPA issues with allocation text
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CRIMOND

Flood risk bullet point: For consistency, we **recommend** the following bullet point is added:

- **Due to the presence of small watercourses running though or adjacent to the site a Flood Risk Assessment will be required for OP2 and may be required for OP1.**

Strategic drainage bullet point: No comment

OP1: Land South of Corse	25 homes	We request the following replacement of the first sentence in the fourth paragraph: “ A Flood Risk Assessment may be required due to the presence of small watercourses along the boundaries of the site and past records flooding. A buffer strip... “
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OP2: Land West of Grimond Medical Centre	30 homes	We note this is a new site which we have not commented on before. We request the following rewording in the first paragraph: “ Due to there are watercourses ... west, therefore a Flood Risk Assessment may will be required. Buffer strips may will be required along the watercourses and should be positively integrated into the open space. The buffer strips should to minimise flood risk and enhance... ”
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CRUDEN BAY

Flood risk bullet point: For consistency in wording and layout, we **request** the following text is added:

- Parts ... Assessment. **Parts of the settlement may be at risk from coastal flooding.** Flood risk assessments may be required.
- **Due to the presence of small watercourses running though or adjacent to the site a Flood Risk Assessment may be required for OP2 and R4**

Strategic drainage bullet point: No comment

OP1: Land at Aulton Road	200 homes/employment	Due to inaccuracy in the text, we request the last three sentences in the third paragraph are deleted and replaced with the following: “ Due potential flood risk from the Water of Cruden, a FRA may be required for any further development not covered by the existing Masterplan and planning permission. ”
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OP2: Land South Aulton Road	31 homes	No further comment on flood risk if the above bullet point is added to the settlement text. Otherwise, we request the reason for the FRA requirement is added to the allocation text for clarity.
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R1	Strategic landscaping	No SEPA issues with allocation text
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R2	Access route	No SEPA issues with allocation text
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R3	Expansion of School	No SEPA issues with allocation text
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R4	Medical facility	No further comment on flood risk if the above bullet point is added to the settlement text. Otherwise, we request the reason for and the FRA requirement is added to the allocation text for clarity.
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FETTERANGUS

Flood risk bullet point: Due to inaccuracy in the text, we **request** the bullet point is **replaced** with the following:

- **Due to the presence of small watercourses running though or adjacent to the sites, Flood Risk Assessments may be required for sites OP2, OP3 and R1**

Strategic drainage bullet point: No comment

OP1: Land North of Ferguson Street	26 homes	We are not aware of any watercourses at or around the site boundaries and it appears the SFRA didn't identify any either. We therefore recommend the following rewording in the third paragraph: "Strategic landscaping will also be required in addition to a buffer adjacent to the watercourse on the southern boundary to reduce landscape and visual impact, particularly along the northern and southern boundaries . Enhancement of these straightened watercourses through re-naturalisation and removal of any redundant features will require to be investigated. A buffer strip ...and visual impact.
OP2: Land adjacent to playing fields	27 homes	The allocation text would benefit from some rewording in addition to the FRA requirement being relocated from the last paragraph to the third. Suggest rewording: "Strategic landscaping is to be added along the watercourse. A buffer strip will be required, particularly adjacent to the watercourses on the northern and southern boundaries of the site, to reduce visual and flood risk impact . A Flood Risk Assessment may be required . Enhancement of the straightened watercourse through renaturalisation and removal of any redundant features will require to be investigated."
OP3: Land East of Gaval Street	49 homes	No SEPA issues with allocation text
R1	Car park & pavilion	We recommend the requirement for a buffer strip to the minor watercourse on the eastern boundary of the site is highlighted in the flood risk bullet point – see above

HATTON

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1: Land of Northfield	40 homes	No SEPA issues with allocation text
OP2: Off Sutton Road	21 homes	No SEPA issues with allocation text
BUS	Business	We note there is a potential surface water flooding issue at this site. The Council's FPU should comment on whether any further requirements need to be highlighted in the allocation text or in a flood risk bullet point.

LONGHAVEN

Flood risk bullet point: Due to inaccuracy in the text, we **request** the bullet point is **replaced** with the following:

- **Due to the presence of a small watercourses running adjacent to the site, a Flood Risk Assessments may be required for site OP1.**

Strategic drainage bullet point: No comment

OP1: Land Adj to School	30 homes	We request for the following text is added to the allocation text: "A buffer strip... development. A Flood Risk Assessment maybe required . Enhancement of ..."
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LONGSIDE

Flood risk bullet point: Due to inaccuracy in the text, we **request** the bullet point is **replaced** with the following:

- **Parts of Longside are shown to be at risk from flooding on the SEPA Indicative Flood Map. Flood Risk Assessments may be required.**
- **Due to a watercourse near to the OP1 site, a Flood Risk assessment may be required.**
- **Due to surface water issues on site OP2, a Flood Risk assessment may be required.**

Strategic drainage bullet point: No comment

OP1: Land off Station Terrace	30 homes	We recommend the following rewording of the allocation text to read better: “ ...occur below 22.05 AOD and . Buffer strips will be required to mitigate flood risk and landscape impact. The buffer strips and should be...”
OP2	Employment	We were not consulted on this site at MIR. SEPA Indicative Maps show surface water flooding. We request the last two sentences in the allocation text is replaced with the following for accuracy and clarity: “ A Flood Risk Assessment may be required due to presence of surface water flooding. ”

LONGSIDE AIRFIELD

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1: Longside Airfield	Employment	As highlighted in our MIR response This site is entirely on the former Peterhead/Longside Airfield. The site is a former military airfield. Given the site’s former use as a military airfield radium 226 may be present due to its use in aircraft dials during WWII, we request the following requirements are added to the allocation text: “ An assessment of the site for potential radioactive substances and a groundwater drainage assessment are required to be submitted. ”
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MAUD

Flood risk bullet point: Due to inaccuracy in the text, we **request** the bullet point is **replaced** with the following:

- **Due to the presence of small watercourses running though or adjacent to the sites, Flood Risk Assessments may be required for sites OP1 and OP2**

Strategic drainage bullet point: No comment

OP1: Land at Castle Road	107 homes	The SFRA identifies buffer strips will be required. We agree with this and request the following text is added to the allocation text after the fourth sentence in the second paragraph: “ A buffer strip will be required along any watercourse in/around the sit, and around the ponds adjacent to the northern boundary. Opportunities to restore and enhance the straightened watercourse should be investigated. ” We also recommend a new paragraph is then started with the remaining text.
OP2: Land West of Castle Terrace	30 homes	While we are very supportive of restoration measures including riparian tree planting, any flood risk needs to be <u>avoided</u> and can’t be mitigated in this way. We also note the text contradicts the SFRA which states a FRA and buffer strips <u>will</u> be required. We therefore request the second half of the second paragraph in the allocation text is replaced with the following: “ A Flood Risk Assessment will be required and any areas of flood risk will be unsuitable for development. A buffer strip will be required along the length of the watercourse adjacent to the site which should be integrated positively into the development. Opportunities to restore and enhance the straightened watercourse should be investigated. ”
OP3	10 homes	No SEPA issues with allocation text

MINTLAW

Flood risk bullet point: Due to inaccuracy in the text, we **request** the bullet point is **replaced** with the following:

- **Parts of sites OP1, OP2, OP3 and OP5 may be at risk of flooding as identified on the SEPA Flood Maps or because they have a small watercourse running through or adjacent to the site. Flood Risk Assessments may be required.**
- **Due to the presence of a small watercourse, any further development at site BUS2 any require a Flood Risk Assessment. A buffer strip will be required and opportunities to restore and enhance the straightened watercourse should be investigated.**

Strategic drainage bullet point: No comment

OP1: Land at Nether Aden	500 homes mixed uses	We highlight the typo in the second sentence of the fourth paragraph: “buffer strips”
OP2: Land at North Woods	600 homes, school	No SEPA issues with allocation text
OP3: Former Artlaw Cres	20 homes	No SEPA issues with allocation text
OP4: Land South Sutherland Dr.	34 homes	No SEPA issues with allocation text
OP5: South of Nether Aden Rd	50 homes	We recommend the removal of the last sentence of the third paragraph in relation to retention of trees – repeat of requirement already in second paragraph
OP6: Land North of Balring Road	employment	No SEPA issues with allocation text
R1	District heating	We recommend removal from flood risk bullet point – no watercourse on/adjacent to site.
BUS1	Business	No SEPA issues with allocation text
BUS2	Business	Further development on this site will require additional developer requirements. We request these are included in a separate flood risk bullet point as requested above.

NEW DEER

Flood risk bullet point: n/a

Strategic drainage bullet point: No comment

OP1: Land at Fordyce Road	35 homes	No SEPA issues with allocation text
OP2: Land at Auchreddie Rd	7 homes	No SEPA issues with allocation text
OP3: Land at Aichreddie Croft	30 homes	No SEPA issues with allocation text
R1	Footway	No SEPA issues with allocation text

NEW LEEDS		
Flood risk bullet point: n/a		
Strategic drainage bullet point: No comment		
NEW PITSLIGO		
Flood risk bullet point: We recommend the following bullet point is added:		
<ul style="list-style-type: none"> • Due to surface water flood risk a Flood Risk Assessment may be required for site OP2 		
Strategic drainage bullet point: No comment		
OP1: Land at Alexander Bell Pk	12 homes	No SEPA issues with allocation text
OP2: Land at Denedoch	90 homes	We recommend the following text is added to the last sentence of the allocation text: "A flood risk Assessment may be required to assess surface runoff from adjacent land. "
OLD DEER		
Flood risk bullet point: n/a		
Strategic drainage bullet point: No comment		
OP1: Land at Abbey Street	10 homes	No SEPA issues with allocation text
OP2:	17 homes	No SEPA issues with allocation text
R1	Cemetery extension	We request the following text is added to the allocation text : " Due to the likely hydraulic connectivity of this site to the Cock Burn, a detailed groundwater assessment will be required to fully assess the suitability of this site as a cemetery. "
PETERHEAD		
Flood risk bullet point: For consistency we recommend removal of reference to P7, and request , for accuracy, the following rewording of the bullet points:		
<ul style="list-style-type: none"> • Peterhead is identified as an area potentially vulnerable to flooding in the National Flood Risk Assessment. Parts of the town are at risk from coastal flooding. Flood risk assessments may be required. • Parts of sites OP1, OP2, OP3, OP4, OP5, OP6, CC1, R2, R3, BUS3, BUS4 and SR1 may be at risk of flooding as shown on the SEPA Indicative Flood Maps or because there is a small watercourse running through or adjacent to the site. Flood Risk Assessments may be required. Buffer strips will be required alongside all watercourses. 		
Strategic drainage bullet point: No comment		
OP1: Inverugie Meadows	1265 homes mixed use	We request the following additional wording to the last paragraph of the allocation text: "Buffer strips ... development. Opportunities to restore and enhance the straightened watercourse should be investigated. Enhanced SUDs..."
OP2: Wester Clerkhill	210 homes	No SEPA issues with allocation text
OP3: Land at West Road	225 homes	We request the following rewording of the last paragraph of the allocation text, for consistency and hydromorphology concerns: "A Flood Risk and Geomorphological Assessment will be required. A buffer strip will be required along the Collie Burn and should be integrated positively into the development. No construction should take place within the natural river corridor. Opportunities to restore and enhance the straightened watercourse should be investigated.
OP4: Land West employment		We recommend the following wording is added to the allocation text due to the surface water flooding issue on this site:

of A90 (T)		“A Flood Risk Assessment may be required to assess surface water flooding on the site”
OP5: Land at Wellbank	employment	No SEPA issues with allocation text
OP6: Land West of Damhead Way	commercial	The SEPA Indicative Flood Map shows a significant portion of this site to be at flood risk from the watercourse running through the site and the P4 area is unlikely to be of sufficient width to eliminate this flood risk, we therefore will object to the Proposed Plan unless the following wording is added to the allocation text and this site is included in the flood risk bullet point above: “The SEPA Indicative Flood Map shows a significant portion of this site to be at risk of flooding from the watercourse running through it. A Flood Risk Assessment will be required to determine the developable area and width of buffer strip required along the watercourse. It is likely the buffer strip will need to be significantly wider than that already provided by the protected area P4. Opportunities to restore and enhance the straightened watercourse should be investigated.”
CC1	commercial	To be consistent with the flood risk bullet point we recommend the following text is added to this allocation text: “A Flood Risk Assessment may be required to assess surface water flooding on the site.”
R1	Sport & recreation	No SEPA issues with allocation text
R2	Power Station	Due to there being a number of watercourses throughout the site, we request this site is included in the flood risk bullet point.
R3	Education & community	Due to there being a number of watercourses throughout the site, we request this site is included in the flood risk bullet point.
R4	Social care	No SEPA issues with allocation text
BUS1	business	No SEPA issues with allocation text
BUS2	business	No SEPA issues with allocation text
BUS3	business	We note the requirement for a FRA is identified in the SFRA and therefore request this site is included to the flood risk bullet point.
BUS4	Business	Due to there being a watercourse adjacent to the site and previous flooding on site, we request this site is included in the flood risk bullet point.
SR1	Strategic employment	Due to watercourse on southern boundary, SEPA Indicative flood map extent and surface water issues, we request this site is included in the flood risk bullet point.
RORA		
Flood risk bullet point: n/a		
Strategic drainage bullet point: No comment		
OP1	6 homes	No SEPA issues will allocation text
ST COMBS		
Flood risk bullet point: We request the following rewording to the bullet point:		
<ul style="list-style-type: none"> • There is a small watercourse alongside site OP1 and some risk of surface water flooding to both OP1 and OP2. Flood Risk Assessments may be required. 		

<u>Strategic drainage bullet point:</u> No comment		
OP1: Site North of High Street (N)	40 homes	No SEPA issues will allocation text – just request additional wording in the bullet point highlighted above.
OP2: Site North of High Street (S)	7 homes	No SEPA issues will allocation text
ST FERGUS		
<u>Flood risk bullet point:</u> This site is not within the SEPA Indicative Flood Map 1 in 200 flood extent and only a small field drain flowing away from the site on the southern boundary. SEPA have no FRA requirement. If the Council does, then we request the bullet point is replaced with the following:		
<ul style="list-style-type: none"> • Due to the presence of surface water flooding a Flood Risk Assessment may be required for site OP1 		
<u>Strategic drainage bullet point:</u> No comment		
OP1: South of Newton Road	38 homes	No SEPA issues will allocation text – see above.
ST FERGUS GAS TERMINAL		
<u>Flood risk bullet point:</u> We request the bullet point is replaced with the following text:		
<ul style="list-style-type: none"> • Parts of the site are shown to be at risk of flooding on the SEPA Indicative Flood Map. Flood Risk Assessments may be required. Buffer strips will be required alongside watercourses and opportunities to restore and enhance them should be investigated. 		
<u>Strategic drainage bullet point:</u> No comment		
R1	Oil and gas	See above
STRICHEN		
<u>Flood risk bullet point:</u> n/a		
<u>Strategic drainage bullet point:</u> No comment		
OP1: West of Burnshangle Ho	18 homes	No SEPA issues with allocation text
OP2: Hospital Brae	22 homes	No SEPA issues with allocation text
OP3: Land at Brewery Road	49 homes	No SEPA issues with allocation text
STUARTFIELD		
<u>Flood risk bullet point:</u> For consistency we recommend the removal of P6 from the bullet point.		
<u>Strategic drainage bullet point:</u> No comment		
OP1: North of Knockstreet	75 homes & recreation	No SEPA issues with allocation text
R1	SUDS	No SEPA issues with allocation text
R2	Recreation/	No SEPA issues with allocation text

	Community	
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FORMARTINE

PROPOSED PLAN REF	PROPOSAL	SEPA REVIEW AND REQUESTED MITIGATION/DEVELOPER REQUIREMENT
BALMEDIE Flood risk bullet point: For consistency we request the bullet point is reworded as follows: <ul style="list-style-type: none"> • Small watercourses run through or adjacent to OP1 and OP3 sites. There is also a surface water flood risk on OP3. Flood risk assessments may be required. Strategic drainage bullet point: no comment		
OP1: Land at Balmedie South	Mixed use	We recommend the sentences referring to the FRA and enhancement of watercourses are brought up the paragraph in the allocation text and sit after the sentence referring to the green-blue network.
OP2: Land South of Chapelwell	220 homes	No SEPA issues with allocation text
OP3: Menie	Golf courses, hotel, houses,	We request the addition of the following text to the last paragraph of the allocation text: “A flood risk assessment may be required should development proposals be revised or extent permission lapse.”
R1	Community uses	No SEPA issues with allocation text
BARTHOL CHAPEL Flood risk bullet point: For consistency, we request the following bullet point is added to the settlement text: <ul style="list-style-type: none"> • Due the presence of a small watercourse a flood risk assessment may be required for site OP1 Strategic drainage bullet point: We request the first sentence is replaced with the following wording for consistency: “There is no public waste water infrastructure in Barthol Chapel.” And request the remaining text in this bullet point is removed and added to the OP1 allocation text.”		
OP1: Land at Barthol Chapel	5 homes	Flood risk: no further comment on allocation text Drainage: We request additional waste water drainage text to this allocation text as outlined above in our comment regarding the strategic drainage bullet point.
BELHELVIE Flood risk bullet point: For consistency, we recommend OP2 is added to this bullet point as there is a FRA requirement in the allocation text. Strategic drainage bullet point: No comment		
OP1: East End of Park Terrace	14 homes	No SEPA issues with allocation text
OP2: Land at Cairntack (East)	41 homes	No SEPA issues with allocation text
OP3: Land East of Cairn View	49 homes	No SEPA issues with allocation text
R1	Community centre	No SEPA issues with allocation text

BLACKDOG		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: Land at Blackdog	600 homes mixed uses	For consistency with the flood risk bullet point we request the first two sentences of the third paragraph is replaced with: “Due the presence of small watercourses running through the site a Flood risk Assessment will be required”
BUS	Business Uses	No SEPA issues with allocation text
COLLIESTON		
Flood risk bullet point: We request , for consistency, that the following text is added to the bullet point: “Flood risk assessments may be required”		
Strategic drainage bullet point: We request the following strategic drainage bullet point is added to this settlement text:		
<ul style="list-style-type: none"> • Due to the presence of a designated bathing water beach at Collieston, any development will require to connect to the public waste water network. 		
R1	Community enterprises	No SEPA issues with allocation text
CULTERCULLEN		
Flood risk bullet point: n/a		
Strategic drainage bullet point: We request the addition of a strategic drainage bullet point in the settlement text for consistency and request Scottish water confirm the capacity of its infrastructure in this settlement and wording of the bullet point is agreed accordingly.		
CUMINESTON		
Flood risk bullet point: For consistency we recommend the following rewording of the bullet point:		
<ul style="list-style-type: none"> • Parts of OP1 are susceptible to fluvial flooding from the Teuchar Burn. A Flood Risk Assessment will be required. 		
Strategic drainage bullet point: No comment		
OP1: Northwest of Teuchar Road	60 homes	No SEPA issues although allocation text could be made more succinct.
BUS	Business uses	No SEPA issues with allocation text
DAVIOT		
Flood risk bullet point: n/a		
Strategic drainage bullet point: No comment		
ELLON		
Flood risk bullet point: For consistency, we recommend the text is made more succinct as, except for the BUS site, the allocation texts contain further information, and CC1 is added to this bullet point and its dedicated bullet point is removed :		
<ul style="list-style-type: none"> • Parts of sites OP1, OP3, CC1 and BUS are located adjacent to the SEPA Indicative 1 in 200 flood risk area or have small watercourse running through or adjacent to the site. A flood risk assessment will be required and buffer strips will be required alongside the watercourses. 		
Strategic drainage bullet point: No comment		
OP1, Cromleybank	980 homes/ school/	No SEPA issues although allocation text could be made more succinct.

	employment	
OP2: Former Academy	Mixed use	No SEPA issues with allocation text
OP3: Hillhead Drive	10 homes	No SEPA issues with allocation text
OP4: Balmacassie	Employment	No SEPA issues with allocation text
R1	Cemetery	No SEPA issues with this allocation
R2	Rail link	No SEPA issues with this allocation
BUS	Business uses	No SEPA issues with allocation text
CC1: Waterton	Retail/leisure	No SEPA issues with allocation text

FOVERAN

Flood risk bullet point: For consistency, we **recommend** the text is made more succinct as the allocation texts contain further information:

- **Parts of sites OP1, OP2 and OP3 are located adjacent to the SEPA Indicative 1 in 200 flood risk area or have small watercourse running through or adjacent to the site. A flood risk assessment may be required.**

Strategic drainage bullet point: Given that planning permission is likely to be granted and construction started/completed on the Growth project for this settlement before the Plan is adopted, we **request** the last sentence in this bullet point is removed and replaced with: **“All development will be required to connect to the public waste water system.”**

OP1: South of Westfield Farm	100 homes, employment	No SEPA issues with allocation text
OP2: West of McBey Way	75 homes	No SEPA issues with allocation text
OP3: South of Turin Way	36 homes	No SEPA issues with allocation text
OP4: Site 2, Blairythan Terr	20 homes	No SEPA issues with allocation text
OP5: Land Adj to Former A90	14 homes	No SEPA issues with allocation text

FYVIE

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1: North East of Peterwell Rd	30 homes	No SEPA issues with allocation text
R1	Transport	No SEPA issues with allocation text

	interchange	
R2	Access for OP1	No SEPA issues with allocation text
GARMOND		
Flood risk bullet point: We did not request this bullet point at MIR stage – We request removal of this bullet point.		
Strategic drainage bullet point: We request the removal of the last sentence of this bullet point.		
KIRKTON OF AUCHTERLESS		
Flood risk bullet point: We request removal of this bullet point. All developments in the Plan require SUDS and not just because of flood risk.		
Strategic drainage bullet point: We request the following sentence is added to this bullet point: “Private systems may not be feasible due to unsuitable site conditions”		
OP1: Kirkton of Auchterless	5 homes	No SEPA issues with allocation text
R1	Play park	No SEPA issues with allocation text
R2	Car park	No SEPA issues with allocation text
METHLICK		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: Cottonhillock	20 homes	We recommend the third sentence in the third paragraph is reworded : “A buffer strip shall be provided along the ephemeral watercourse route which is to and shall be integrated...”
OP2: West of Black Craigs	8 homes	No SEPA issues with allocation text
OP3: Land at Sunnybrae Croft	12 homes	No SEPA issues with allocation text
OP4: Adjacent to Belmuir Lodge	63 homes	No SEPA issues with allocation text
NEWBURGH		
Flood risk bullet point: We request the following rewording to the first bullet point:		
<ul style="list-style-type: none"> • ...National Flood Risk Assessment. Parts of the settlement may also be at risk from coastal flooding. Flood Risk Assessments... 		
And we request the third bullet point is reworded to start with:		
<ul style="list-style-type: none"> • Sites OP1, OP2, OP3 and BUS have small watercourses... 		
Strategic drainage bullet point: No comment		
OP1: West of Airyhall View	Community/employment	No SEPA issues with allocation text
OP2: Knockhall Road	60 homes	No SEPA issues with allocation text

OP3: Mill of Newburgh	160 homes	No SEPA issues with allocation text
BUS	Business	No SEPA issues with allocation text
<p>OLDMELDRUM</p> <p><u>Flood risk bullet point:</u> We request the following rewording to the first bullet point:</p> <ul style="list-style-type: none"> Parts of OP2, OP3, OP5, OP6 and R1 are within... <p>And we request the following rewording of the second bullet point:</p> <ul style="list-style-type: none"> Part of the BUS site is within the 1 in 200 flood risk area of the Meadow Burn. A Flood Risk Assessment will be required. Buffer strips will be required along the Burn which should be integrated positively into the development. Morphological improvements to the Burn may be required. <p><u>Strategic drainage bullet point:</u></p> <p>We highlighted at MIR stage the Plan wording needed to highlight the significant waste water treatment issues in Oldmeldrum. Whilst the Proposed Plan text states a technical solution is still being sought by Scottish Water, as a result of low dilution availability in the receiving waters, we highlight private treatment built to an adoptable standard will not be acceptable for the same reason. Therefore, we request the Strategic drainage bullet point is changed, for clear transparency to potential developers, to:</p> <ul style="list-style-type: none"> Oldmeldrum Waste Water Treatment Works has limited capacity. Scottish Water are investigating options for a growth project but until a technical solution is found this cannot be confirmed. All new development in Oldmeldrum must connect to the public waste water network and therefore, until a growth project is implemented, development during the Plan period may be limited. 		
OP1: North of Distillery Road	88 homes	No SEPA issues with allocation text
OP2: Coutens	85 homes	No SEPA issues with allocation text
OP3: South of Milburn Road	26 homes	No SEPA issues with allocation text
OP4: Land at Chapel Park,	68 homes	No SEPA issues with allocation text
OP5: Newbarns	146 homes	We request the following additional requirement is added to the allocation text due to 50% of the site possibly being underlain with peat: "A Flood Risk Assessment and Phase 1 Habitat Survey will be required. Due to the possibility of a significant amount of peat on the site, a Peat survey will also be required. "
OP6: West of Coutens	Employment	No SEPA issues with allocation text
R1	Education	We were not consulted on this site at MIR. We request the following text is added to the R1 allocation text: "Peaty gleys and mixed habitats are likely to be present on site. A Peat Survey and Phase 1 Habitat are required.
R2	Community	No SEPA issues with allocation text
R3	Transport Interchange	No SEPA issues with allocation text
BUS	Employment	No SEPA issues with allocation text

<p>PITMEDDEN</p> <p><u>Flood risk bullet point:</u> We request OP3 and R1 is added to the first bullet point and recommend the buffer strip reference is removed as this requirement is in the allocation text. And we request R1 is added to the second bullet point:</p> <ul style="list-style-type: none"> • Parts of OP1 and OP3 ... A Flood Risk Assessment will be required. • A Flood Risk Assessment will be required for BUS1 and R1. and an Adequate buffer strips will be required along the watercourses which ... <p><u>Strategic drainage bullet point:</u> No comment</p>		
OP1: Land at Bonnyton Farm	64 homes	No SEPA issues with allocation text
OP2: Land Southwest of Pitmedden	219 homes	We request the following rewording to the start of the second paragraph: “Buffer strips will be required adjacent to the watercourses surrounding running through the site...be investigated. Part of the site is adjacent to an area predicted to by SEPA to flood and The site may have pockets....”
OP3: Mill of Allathan	68 homes	We commented at Bid stage that and FRA would be required depending on the proposed layout. However, this has not been included and we will object to this allocation unless flood risk is highlighted. In addition to being added to the flood risk bullet point above we request the following text is added to the allocation text: “A Flood Risk Assessment will be required. A buffer strip will be required adjacent to the watercourse on the northern boundary of the site which should be integrated positively into the development.”
OP4: Land at Cloisterseat	10 homes/ employment	No SEPA issues with allocation text
R1	Village Hall	We commented at Bid stage that and FRA would be required depending on the proposed layout. However, this has not been included and we will object to this allocation unless flood risk is highlighted in the flood risk bullet point.
BUS1	Business	No SEPA issues with allocation text
<p>POTTERTON</p> <p><u>Flood risk bullet point:</u> We request second bullet point is removed and some of the text incorporated into bullet point one for consistency. The buffer text can be removed as this is within the allocation text for OP2 and not required for OP1:</p> <ul style="list-style-type: none"> • Parts of OP1 and OP2 ... adjacent to the sites. There are also large areas of surface water flooding on both sites. Flood Risk Assessments will be required. <p><u>Strategic drainage bullet point:</u> No comment</p>		
OP1: Land North of Denview Road	172 homes & community	We request the second and third sentences are removed from the last paragraph in the allocation text as there appears to be no watercourse on this site.
OP2: North West of Denview Road	61 homes	No SEPA issues with allocation text
<p>RASHIERIEVE FOVERAN</p> <p><u>Flood risk bullet point:</u> We request the bullet point is replaced with the following text:</p> <ul style="list-style-type: none"> • OP1 and SR1 have small watercourse running through or adjacent to the site. A Flood Risk Assessment may be required. <p><u>Strategic drainage bullet point:</u> We request the last two sentences are deleted and replaced with the following wording:</p>		

<ul style="list-style-type: none"> ...initiated. Any private treatment will require to be built to an adoptable standard. The preference would be for a single WWTW serving OP1 with capacity for SR1 to connect to at a future date. 		
OP1: West of Rashierieve Cttge	8 live/work units	No SEPA issues with allocation text
SR1	Strategic employment	No SEPA issues with allocation text
ROTHIENORMAN <u>Flood risk bullet point:</u> We request the second bullet point is removed in the settlement text. These requirements are in the allocation text and do not need to be highlighted here so as to be consistent with the rest of the Plan. <u>Strategic drainage bullet point:</u> As requested at MIR stage, and for consistency, we request the following wording is added at the start of this bullet point: <ul style="list-style-type: none"> There is limited capacity at Rothienorman waste water treatment works. A growth... 		
OP1: West of Blackford Ave	12 homes	No SEPA issues with allocation text
OP2: Site West of Fogue Road	Employment	No SEPA issues with allocation text
ST KATHERINES <u>Flood risk bullet point:</u> n/a <u>Strategic drainage bullet point:</u> For consistency, we request the first four sentences of this bullet point are replaced with the following text: <ul style="list-style-type: none"> There is no public waste water infrastructure in St Katherines. A mains water... 		
OP1: Cromlet Park West	5 homes	No SEPA issues with allocation text
OP2: Land North of St Katherines	35 homes/mixed use	We request the following is added to the allocation text: “A single waste private water treatment plant, built to an adoptable standard, will be required for this site. It will be preferable for the provision of one treatment plant to service both OP1 and OP2.”
TARVES <u>Flood risk bullet point:</u> We request removal of the last part of this bullet point. All developments in the Plan require SUDS and not just because of flood risk. <ul style="list-style-type: none"> Part of OP1...A Flood Risk Assessment may be required. <u>Strategic drainage bullet point:</u> No comment		
OP1: The Grange	113 homes/Mixed use	No SEPA issues with allocation text
OP2: Braiklay Park	15 homes	No SEPA issues with allocation text
OP3: Land at Braiklay Croft	19 homes	No SEPA issues with allocation text
TIPPERTY <u>Flood risk bullet point:</u> We recommend the first bullet point is replaced with: <ul style="list-style-type: none"> Parts of Tippetty are at risk of surface water flooding and fluvial flooding from the Tarty burn. Flood Risk Assessments may be required. 		

<p>Should this OP2 site stay within the Plan (see comment below on the allocation), we request, for consistency, the second bullet point is replaced with:</p> <ul style="list-style-type: none"> • Approximately 50% of site OP2 as at risk of flooding from the Tarty Burn. A Flood Risk Assessment will be required to determine the developable area and finished floor levels <p>We also recommend the addition of a third bullet point:</p> <ul style="list-style-type: none"> • A Flood Risk assessment will be required for OP1 site large areas of which experience surface water flooding. <p><u>Strategic drainage bullet point:</u> No comment</p>		
OP1: Site 1, Land East of Industrial Estate	Employment	No SEPA issues with allocation text
OP2: Land South of Industrial Estate	Employment	<p>We have highlighted previously (at Bid consultation stage and MIR stage) that we would not support this allocation in the Plan unless a flood risk assessment (FRA) was carried out <u>prior</u> to it being included in the Plan, to demonstrate that it was an appropriate site for development. No FRA has been provided. The SEPA Flood Indicative Map indicates that at least half of the site is part of the functional floodplain of the Tarty Burn and so development of the site would be contrary to Scottish Planning Policy. Development there may be at risk of flooding, and could increase risk to nearby areas. The Proposed Plan states that access to the site would be from the A90 which would be through the western end of the site which is floodplain - this is likely to reduce the capacity of the floodplain.</p> <p>We object to this site being allocated in the Plan in its current form. In order to address our objection, either (a) the site should be removed from the Plan; (b) The site boundary should be amended to exclude the areas expected to flood, <u>and</u> the requirement to take access through the floodplain should be removed; or (c) a detailed Flood Risk Assessment should be submitted in support of the site <u>prior</u> to it being allocated (allowing sufficient time for a review and validation of the assessment). <u>Some style comments as before</u></p> <p>In addition to flood risk, approximately 50% of the site lies within the natural river corridor of the Tarty Burn. Any development within this corridor would inhibit the Burn to take its natural course in the long term and therefore we would object to any development proposal which did not include the natural river corridor within the buffer required for this watercourse. As such access from the A90 south of Newark Cottage is unlikely to be appropriate.</p>
<p>TURRIFF</p> <p><u>Flood risk bullet point:</u> For consistency, we request the second bullet point is replaced with:</p> <ul style="list-style-type: none"> • Due to small watercourses running through or adjacent to the site, Flood Risk Assessments may be required for sites OP1 and OP5 <p>And, again for consistency, recommend a third bullet point is added:</p> <ul style="list-style-type: none"> • Parts of OP3 and R1 are at risk from surface water flooding. A flood risk assessment may be required <p><u>Strategic drainage bullet point:</u> No comment</p>		
OP1: Adjacent to Wood of Delgaty	450 homes , community facilities and employment	We recommend the the following rewording in the last paragraph: "Watercourses on site should may also..."
OP2: North of Shannocks Way	227 homes	No SEPA issues with allocation text
OP3: Adjacent Bridgend Terr	40 homes	No SEPA issues with allocation text but recommend this site is included in an additional third flood risk bullet point as highlighted above

OP4: Adjacent to Broomhill Rd	Employment	No SEPA issues with allocation text
OP5: South of Colly Stripe	27 homes	No SEPA issues with allocation text
OP6: Land North of Cornfield Rd	40 homes	No SEPA issues with allocation text
R1	New cemetery	No SEPA issues with allocation text
R2	Primary school	We note the SFRA identifies a FRA is required due to flood risk and recommend this site is included in an additional third flood risk bullet point as highlighted above
BUS1	Business	No SEPA issues with allocation text
BUS2	Business	No SEPA issues with allocation text
UDNY GREEN		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: Opposite Bronie House	15 homes	No SEPA issues with allocation text
UDNY STATION		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: Woodlea East	35 homes	No SEPA issues with allocation text
WEST PITMILLAN		
Flood risk bullet point: No comment		
Strategic drainage bullet point: We request the following minor rewording to this bullet point: "All sites in West Pitmillan will to connect..."		
OP1: West Pitmillan	Employment	We request the following wording is added at the start of the second paragraph: "A Flood Risk Assessment may be required due the possible presence of culverted watercourses on the site."
BUS	Employment	No SEPA issues with allocation text
WOODHEAD		
Flood risk bullet point: We recommend the following general bullet point is added: <ul style="list-style-type: none"> • Parts of Woodhead are susceptible to surface water flood risk. Flood risk assessments may be required. 		
Strategic drainage bullet point: We request the addition of the following strategic drainage bullet point in the settlement text for consistency: "There is no public waste water infrastructure in Woodhead."		

YTHANBANK

Flood risk bullet point: No comment

Strategic drainage bullet point: For consistency, we **request the bullet point is replaced with the following: "There is no public waste water infrastructure in Ythanbank. There is water available, however, early engagement with Scottish Water is advised"**

OP1: Michaelmuir Croft	5 homes	We request the following is added to the allocation text: "A single waste private water treatment plant, built to an adoptable standard, will be required for this site."
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GARIOCH		
PROPOSED PLAN REFERENCE	PROPOSAL	SEPA REVIEW AND REQUESTED MITIGATION/DEVELOPER REQUIREMENT
AUCHLEVEN		
Flood risk bullet point: No comment Strategic drainage bullet point: No comment		
OP1: Auchleven Croft	5 homes	No SEPA issues with allocation text
OP2: Adjacent to Premnay Sch	9 homes	No SEPA issues with allocation text
BLACKBURN		
Flood risk bullet point: We request , for consistency, the following text is added to the second bullet point: “ A Flood Risk Assessment may be required ” Strategic drainage bullet point: No comment		
OP1: Caskieben	240 homes	As the western part of the site is over 100m away from the Black Burn we recommend any reference to the Black Burn is removed in the allocation text and replaced with ‘ A buffer strip will be required adjacent to the small watercourse that runs through the site which should be integrated positively into the development. The buffer strip will need to allow sufficient space for restoration of the straightened watercourse. Enhancement and removal of any redundant features will require to be investigated. ’
R1	Allotments/ community	No SEPA issues with allocation text
BUS	Business	No SEPA issues with allocation text
CHAPEL OF GARIOCH		
Flood risk bullet point: No comment Strategic drainage bullet point: We request the second sentence is deleted and replaced with the following: “ Full authorisation will be required from SEPA for any private treatment which will need to be built to an adoptable standard. ”		
OP1: Land at Pitbee	10 homes	In conjunction with our request above for the rewording of the strategic drainage bullet point, we request the last two sentences referring to waste water be deleted in this allocation text as we are satisfied this issue will be addressed in the strategic drainage bullet point once reworded.
CLUNY and SAUCHEN		
Flood risk bullet point: We recommend the following rewording of the bullet point: “ for these sites this site ” Strategic drainage bullet point: No comment		
OP1: Main Street	76 homes	

DUNECHT

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1: West of Tillybrig	33 homes	No SEPA issues with allocation text
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DURNO

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

ECHT

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1: North of Forbes Park	25 homes	No SEPA issues with allocation text
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GARLOGIE

Flood risk bullet point: We **request**, for consistency, the following general bullet point is **added** to the settlement text:

- **Garlogie lies within an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required.**

Strategic drainage bullet point: We **request**, for consistency, the following strategic drainage bullet point is **added** to the settlement text:

- **There is no public waste water infrastructure in Garlogie.**

HATTON OF FINTRAY

Flood risk bullet point: We **recommend**, for consistency, a bullet point is **added** to the settlement text:

- **Due to the presence of a small watercourse adjacent to the site OP1 a Flood Risk Assessment may be required**

Strategic drainage bullet point: No comment

OP1: North of B977	16 homes	We recommend the following rewording of the allocation text: "Enhancement of these this through renaturalisation and removal of any redundant features will be required to be investigated."
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INSCH

Flood risk bullet point: We **request the second and third bullet points** are replaced with the following:

- **A detailed flood study by Aberdeenshire Council has confirmed the sites OP1 and R4 are at significant risk of flooding.**
- **A further detailed Flood Risk Assessment will be required for site R4 which will need to demonstrate any development proposed is designed to be capable of remaining fully operational and accessible during an extreme flooding event and will not increase flood risk elsewhere.**

In addition, we **request a further additional bullet point** is added to the settlement text:

- **Due to the presence of small watercourses running through or adjacent to the site, a Flood risk Assessment may be required for sites OP3, R6 and BUS. Appropriate buffer strips will be required alongside the watercourses. Enhancement of any straightened watercourses and removal of any redundant features will require to be investigated.**

Strategic drainage bullet point: No comment

OP1: Land at North road	48 homes	In light of our concerns stated in section 2.3.5 above, we request the following text (or similarly worded) is added to the allocation text: "If the extant permission lapses it is unlikely any further development proposal would be permissible due to new flood risk information being
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		provided by the Council Flood Study for Inch.”
OP2: Hillview, South Road	10 homes	No SEPA issues with allocation text
OP3: North of Inch Business Pk	Employment	No SEPA issues with allocation text
R1	Access	No SEPA issues with allocation text
R2	Town Park	No SEPA issues with allocation text
R3	Walkway	No SEPA issues with allocation text
R4	Hospital expansion	We request the rewording of the bullet point relating to this site as stated above but also please refer to our overall comments regarding this site in section 2.3.6 of our response.
R5	Town Centre	No SEPA issues with allocation text
R6	Primary school	We note we have not been invited to comment on this site previously in this Plan process. There appears to be small watercourses through the centre of the site and on the north west boundary, and Valentine Burn is on southern boundary. A FRA may be required and buffer strips will be required alongside the watercourses. Enhancement of the straightened watercourses and removal of any redundant features will require to be investigated. Hence the request for this text to be added in an additional bullet point above
BUS	Employment	We note we have not been invited to comment on this site previously in this Plan process. There appears to be a small watercourses on the west boundary. A FRA may be required and buffer strips will be required alongside the watercourses. Enhancement of the straightened watercourses and removal of any redundant features will require to be investigated. Hence the request for this text to be added in an additional bullet point above
INVERURIE and PORT ELPHINSTONE Flood risk bullet point: We request for consistency the following bullet points are added to the settlement statement: <ul style="list-style-type: none"> • Due to watercourses running through or adjacent to the site and/or surface water flooding, Flood Risk Assessments will be required for sites OP5, OP13 and OP16. Flood Risk Assessment may be required for sites OP3. • A detailed flood study by Aberdeenshire Council has confirmed site OP4 is at risk of flooding. A Flood Risk Assessment will be required for any future development on this site. • All BUS sites have surface water flood risk areas and/or are adjacent to watercourses. A Flood Risk Assessment may be required. Appropriate buffer strips will be required alongside the watercourses. Renaturalisation of the watercourses and removal of any redundant features should be investigated. Strategic drainage bullet point: No comment		
OP1: Conglass	57 homes	No SEPA issues with allocation text
OP2: Former Health Centre	Mixed uses	No SEPA issues with allocation text
OP3: Land at Harlaw Park	50 homes	If the third bullet point isn't added to the settlement text as requested above, we request the wording "A Flood Risk Assessment will be required due to surface water flood risk " is added to the allocation text.

OP4: Phase 2 Portstown	416 homes	Flood risk: Should extant permission lapse any future developments will have to take account of the latest Council Flood Study for Inverurie.
OP5: Crichie	737 homes/ Community	No SEPA issues with allocation text
OP6: Crichie (Employment)	Employment	No SEPA issues with allocation text
OP7: Uryside Phase 2	681 homes	No SEPA issues with allocation text
OP8: Former Hatchery	64 homes	No SEPA issues with allocation text
OP9: Adj to Axis Business Centre	Employment	No SEPA issues with allocation text
OP10:Thainstone	Employment	No SEPA issues with allocation text
OP11: Pineshaw	54 homes	No SEPA issues with allocation text
OP12: North Street Inverurie	80 homes/ mixed use	No SEPA issues with allocation text
OP13: Kirkwood Commercial Pk	Employment	No SEPA issues with allocation text other than to recommend removing “(FRA)” for consistency
OP14: NE of Thainstone Roundabout	Travellers site /or employment	No SEPA issues with allocation text
OP15: West of Bennachie View Care Home	130 homes	No SEPA issues with allocation text
OP16: West of Conglass Cottages	Mixed Use	No SEPA issues with allocation text
R1	Transport interchange	No SEPA issues with allocation text
R2	Park extension	No SEPA issues with allocation text
R3	Community/ Education	No SEPA issues with allocation text
R4	Community	No SEPA issues with allocation text

SR1	Employment	No SEPA issues with allocation text
BUS1	Business	We have requested that all BUS sites are highlighted in a flood risk bullet point for consistency with the SFRA.
BUS2	Business	We have requested that all BUS sites are highlighted in a flood risk bullet point for consistency with the SFRA.
BUS3	Business	We have requested that all BUS sites are highlighted in a flood risk bullet point for consistency with the SFRA.
BUS4	Business	We have requested that all BUS sites are highlighted in a flood risk bullet point for consistency with the SFRA.
BUS5	Business	We have requested that all BUS sites are highlighted in a flood risk bullet point for consistency with the SFRA.
BUS6	Business	We have requested that all BUS sites are highlighted in a flood risk bullet point for consistency with the SFRA.
BUS7	Business	We have requested that all BUS sites are highlighted in a flood risk bullet point for consistency with the SFRA.
BUS8	Business	We have requested that all BUS sites are highlighted in a flood risk bullet point for consistency with the SFRA.
KEITHHALL <u>Flood risk bullet point:</u> Due to records of flooding on site, we request the following text is added to the second bullet point or that site OP1 have a bullet point of its own: <ul style="list-style-type: none"> • Sites OP1 and Bus1 is... <u>Strategic drainage bullet point:</u> No comment		
OP1: South of Inverurie Road	36 homes	No SEPA issues with allocation text
R1	Car park	No SEPA issues with allocation text
KEMNAY <u>Flood risk bullet point:</u> As it was proposed to remove this site from the LDP at MIR stage we did not comment on it but supported its removal. However, now that it is proposed to retained this site in the Plan, we will object to its inclusion unless the following bullet point is added to the settlement statement: <ul style="list-style-type: none"> • Flooding records show in a significant portion of the site OP1 to be at fluvial flood risk from the River Don and a small watercourse on its southern boundary. A Flood Risk Assessment will be required. We recommend rewording of the second bullet point due to the site being a distance away from the River Don flood extent and on relatively high ground, but having a small watercourse on its northern boundary: <ul style="list-style-type: none"> • Due to the presence of a small watercourse on its northern boundary a Flood Risk Assessment may be required for site BUS1. A buffer strip will be required alongside the watercourse. Renaturalisation of the watercourse and removal of any redundant features should be investigated. <u>Strategic drainage bullet point:</u> No comment		
OP1: West of	20 homes	We object to this allocation unless the additional bullet point is added to the settlement text as requested above and the first sentence of the last

Milton Meadows		paragraph in the allocation text is deleted and replaced with: "A significant portion of this site has flooded historically. Flood Risk Assessment will be required to determine the developable area and layout of the site."
OP2: Birley Bush Depot	Employment	No SEPA issues with allocation text
R1	Medical/ community	No SEPA issues with allocation text
R2	Community	No SEPA issues with allocation text
BUS1	Business	No SEPA issues with allocation text
BUS2	Business	No SEPA issues with allocation text
BUS3	Business	No SEPA issues with allocation text
KINGSEAT <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> We highlighted at MIR stage the Plan wording needed to highlight the significant waste water treatment issues at Kingseat as it is connected to the Newmachar network which is at capacity. Whilst the Proposed Plan text states a technical solution is still being sought by Scottish Water, the growth project cannot be confirmed until a technical solution is found, and we cannot advise on the timescales for this at present as the existing receiving waters have little dilution potential for an increase in discharge. <u>This may limit development in the Plan period.</u> We therefore request this is highlighted to any future developers for transparency by replacing the Proposed Plan bullet point with the following: <ul style="list-style-type: none"> • Kingseat connects to the Newmachar Waste Water Treatment Works which is at capacity. Scottish Water are investigating options for a growth project but until a technical solution is found this cannot be confirmed. All new development in Kingseat must connect to the public waste water network and therefore, until a growth project at Newmachar is implemented, development at Kingseat during the Plan period may be limited. 		
OP1: Kingseat Hospital	Housing	No SEPA issues with allocation text
BUS1	Business	No SEPA issues with allocation text
BUS2	Business	No SEPA issues with allocation text
KINMUCK <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> No comment		
KINTORE <u>Flood risk bullet point:</u> We request for consistency the following bullet points are added to the settlement statement: <ul style="list-style-type: none"> • Parts of sites OP1, OP2 and OP7 lie within or adjacent to SEPA's Indicative 1 in 200 year flood risk area or have a watercourse running through or adjacent to the site. Flood Risk Assessments may be required. 		

- Significant areas of BUS3 and BUS4 sites are at risk from flooding by the Tuach Burn and small watercourses. Flood Risk Assessments may be required. Appropriate buffer strips will be required alongside the watercourse. Renaturalisation of the watercourse and removal of any redundant features should be investigated.

Strategic drainage bullet point: No comment

OP1: Kintore East	1000 homes /commercial	No SEPA issues with allocation text
OP2: Woodside Croft	150 homes	No SEPA issues with allocation text
OP3; Kintore South	Mixed use	No SEPA issues with allocation text
OP4: Midmill Business Park	Employment	No SEPA issues with allocation text
OP5: Kintore East	Commercial /community	No SEPA issues with allocation text
OP6: Land adjacent to Woodside Croft	24 homes	We note the requirement for a FRA in this allocation text despite the SFRA not identifying a flood risk. We confirm we have no FRA requirement for this site and recommend your colleagues in your Flood Prevention Unit are consulted to confirm whether this requirement can be removed from the allocation text.
OP7: South of Northern Road-A96	Mixed Uses	No SEPA issues with allocation text
R1	Town park Gauch Hill	No SEPA issues with allocation text
BUS1	Business	No SEPA issues with allocation text
BUS2	Transport interchange	No SEPA issues with allocation text
BUS3	Business	We have requested that BUS3 site is highlighted in a flood risk bullet point above
BUS4	Business	We have requested that BUS3 site is highlighted in a flood risk bullet point above

KIRKTON OF SKENE

Flood risk bullet point: No comment

Strategic drainage bullet point: We **request** the addition of a strategic drainage bullet point in the settlement text for consistency and **request** Scottish water confirm the capacity of its infrastructure in this settlement and wording of the bullet point is agreed accordingly.

LYNE OF SKENE

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

MEIKLE WARTLE

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1: North of Meikle Wartle	12 homes	No SEPA issues with allocation text
R1	Car park	No SEPA issues with allocation text

MIDMAR

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1: Roadside of Corsindae	12 homes	No SEPA issues with allocation text
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MILLBANK

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1 Millbank Crossroads	30 homes/ employment	No SEPA issues with allocation text
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NEWMACHAR

Flood risk bullet point: We **request** site R1 is **added** to the bullet point text "...to sites OP1, **OP3 and R1.**"

Strategic drainage bullet point: We highlighted at MIR stage the Plan wording needed to highlight the significant waste water treatment issues at Newmachar network which is at capacity. The Proposed Plan text needs to highlight a technical solution is still being sought by Scottish Water for the growth project, which has not started - the growth project cannot be confirmed until a technical solution is found, and we cannot advise on the timescales for this at present as the existing receiving waters have little dilution potential for an increase in discharge. This may limit development in the Plan period. We therefore request this is highlighted to any future developers for transparency by deleting the Proposed Plan text in this bullet point and replacing with the following: **"The Newmachar Waste Water Treatment Works is at capacity. Scottish Water are investigating options for a growth project but until a technical solution is found this cannot be confirmed. All new development in Newmachar must connect to the public waste water network and therefore, until a growth project is implemented, development during the Plan period may be limited."**

OP1: Hillbrae Way	340 homes	No SEPA issues with allocation text
OP2: Corseduck Road	95 homes	No SEPA issues with allocation text
OP3 Redwood Cottage	Employment	We recommend the allocation text is made more succinct and the Scottish Water requirement be made separately to those relating to flood risk, the small watercourse and the buffer strip associated with it. Suggested wording: "A Flood Risk Assessment may be required due to a small watercourse running through the site. A buffer strip will be required adjacent to the watercourse which should be integrated positively into the development. The buffer strip will need to allow sufficient space for restoration of the straightened watercourse. Enhancement through renaturalisation and removal of any redundant features in the watercourse should be

		investigated. A Water Impact Assessment...in this respect. (separate paragraph) A Transport...Hillbrea Way”
R1	Recreation	No SEPA issues with allocation text
R2	Education	We request this site is added to the flood risk bullet point text as above
OLD RAYNE		
<p><u>Flood risk bullet point:</u> We request, for consistency, the following bullet point is added to the settlement text:</p> <ul style="list-style-type: none"> Sites OP1 and OP2 lie adjacent to SEPAs Indicative 1:200 flood risk area and/or have small watercourses running through them. Flood Risk Assessment may be required <p><u>Strategic drainage bullet point:</u> We note there is no reference to wastewater drainage in Proposed Plan despite us requesting one at MIR stage. All development in this settlement will be required to connect to the waste water network. Therefore, for consistency, we request a drainage bullet point is added to this settlement text. It should be confirmed with Scottish Water that the proposed population growth is within the design criteria for the existing waste water infrastructure and, if so, this is confirmed in the strategic drainage bullet point or, if not, the need for an upgrade must be highlighted.</p>		
OP1: North of Pitmachie Farm	10 homes	No SEPA issues with allocation text
OP2:Barreldykes	30 homes/ mixed	No SEPA issues with allocation text
OYNE		
<p><u>Flood risk bullet point:</u> No comment</p> <p><u>Strategic drainage bullet point:</u> We welcome the addition of a drainage bullet point for this settlement. However we request the following additional wording: “...Oyne lies with a SEPA Waste Water Drainage Consultation Area. Therefore site investigations will be required for any private system, which will be required to be built to an adoptable standard to allow connection once the growth project is complete”</p>		
OP1: Former Archaeolink Site	10 homes	No SEPA issues with allocation text
BUS		No SEPA issues with allocation text
WESTHILL		
<p><u>Flood risk bullet point:</u> No comment</p> <p><u>Strategic drainage bullet point:</u> No comment</p>		
OP1: Strawberry Field Road	10 homes	No SEPA issues with allocation text
OP2: Burnland	38 homes	No SEPA issues with allocation text
OP3: Former Blockworks	63 homes	We recommend the addition of the following: “A Flood Risk Assessment may be required due to surface water flood risk on site.”
R1	Healthcare	No SEPA issues with allocation text

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KINCARDINE AND MEARNES

PROPOSED PLAN REFERENCE	PROPOSAL	SEPA REVIEW AND REQUESTED MITIGATION/DEVELOPER REQUIREMENT
ARBUTHNOTT <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> For consistency, we request a bullet point is added to the settlement text with the following wording: <ul style="list-style-type: none"> • There is no public waste water infrastructure available in Arbuthnott. 		
AUCHENBLAE <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> We requested at MIR stage reference be made to the status of the waste water drainage in Auchenblae, especially as both Auchenblae and Fordoun pump to Laurencekirk. We request the status of waste water capacity (network and treatment plant) to take this additional flow is confirmed in the settlement text after consultation with Scottish Water and, if required, the need for an upgrade of waste water infrastructure highlighted in this bullet point.		
OP1: Land South of Mackenzie Ave	25 homes	We request the second sentence is deleted from the first paragraph and the following text is inserted after the current third sentence: “Should the extant permission elapse a Flood Risk Assessment will be required to assess the risk from the Burnie Shag watercourse along the southern boundary. Consideration should be given to any culverts/bridges which may exacerbate flood risk.”
BLAIRS <u>Flood risk bullet point:</u> We request the following rewording of the first bullet point: <ul style="list-style-type: none"> • Part of Blair's College Estate lies within an area... <u>Strategic drainage bullet point:</u> We highlighted at MIR stage that no reference was made to waste water drainage. All development in this settlement will be required to connect to a waste water network. We therefore request the status of waste water capacity (network and treatment plant) is confirmed in the settlement text and the need for any upgrade highlighted in the bullet point.		
OP1: Blair's College Estate	325 homes	No SEPA issues with allocation text
CATTERLINE <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> All development in this settlement will be required to connect to the waste water network. Therefore, for consistency, we request a drainage bullet point is added to this settlement text. It should be confirmed with Scottish Water that the proposed population growth is within the design criteria for the existing waste water infrastructure and, if so, this is confirmed in the strategic drainage bullet point or, if not, the need for an upgrade must be highlighted in the bullet point.		
CHAPELTON <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> No comment		
OP1: Chapelton	Mixed uses	No SEPA issues with allocation text

R1	Public open space	No SEPA issues with allocation text
COOKNEY <u>Flood risk bullet point:</u> n/a <u>Strategic drainage bullet point:</u> At MIR stage we requested it was highlighted that there was no public wastewater infrastructure in Cookney. For consistency, we request a bullet point is added to the settlement text with the following text: <ul style="list-style-type: none"> • There is no public waste water infrastructure available in Cookney. 		
DRUMLITHIE <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> No comment		
OP1: Adj. to Bowling Green	Mixed use (30 homes)	No SEPA issues with allocation text
DRUMOAK <u>Flood risk bullet point:</u> n/a <u>Strategic drainage bullet point:</u> No comment		
OP1: North of Sunnyside Farm	11 homes	No SEPA issues with allocation text
R1	Cemetery extension	Due to the presence of a private water supply at the church to this site we request the following requirement is added to the allocation text box: “The potential impact on the private water supply to the church will need to be fully assessed or connection to mains water supply implemented.”
DURRIS FOREST <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> No comment We request, for consistency, a strategic drainage bullet point is added to this settlement with the following text: <ul style="list-style-type: none"> • There is no public waste water treatment available in Cookney. Any private waste water treatment will require full authorisation from SEPA 		
R1: Durris Forest	Recreation	We request the following rewording to the allocation text: “As approximately 50% of the site has Type 5 Peat, a peat survey and Phase 1 Habitat Survey will be required. Peatland restoration should be considered as part of the proposal. A Construction...”
EDZELL WOODS and NEWESK <u>Flood risk bullet point:</u> We request the following rewording of the second bullet point: <ul style="list-style-type: none"> • Sites OP1, and OP2 and BUS are...Flood Risk Assessments may will be required <u>Strategic drainage bullet point:</u> We request the first sentence of this bullet point is replaced with: “There is no public waste water infrastructure at Edzell Woods, only private treatment. Contributions will be required for an upgrade to the existing treatment works or for a new pumping station to connect to the public waste water treatment works at Edzell”		
OP1: New Esk	300 homes Mixed use	We request the following rewording of the first sentence in the fifth paragraph: “An updated Flood Risk Assessment may will be required to assess the risk from the Black Burn if the extant permission lapses or if there is a change to the design layout not previously agreed. Consideration should be given to any culverts/bridges which may exacerbate flood risk. Any

		built development over an active culvert will not be acceptable.
OP2: Edzell Business Base	Employment	As above
BUS	Business	As above
FETTERCAIRN		
<p><u>Flood risk bullet point:</u> We request, for consistency, reference to OP1 site is removed in the first bullet point and has its own separate bullet point. Reference to P3 should be deleted.</p> <ul style="list-style-type: none"> • Site OP1 is at ... required <p><u>Strategic drainage bullet point:</u> No comment</p>		
OP1: Land to the Northwest of Fettercairn	60 homes	<p>We request the following text is added to the third paragraph: "...to be investigated. A Flood Risk Assessment will be required and enhancements to the burn must be supported in this assessment."</p> <p>We note the wording in the strategic drainage bullet point and request the following wording is added to the allocation text: "Connection to the public sewer network will be required and early discussion with Scottish Water should be undertaken."</p>
R1	Road access	No SEPA issues with allocation text
FINDON		
<p><u>Flood risk bullet point:</u> No comment</p> <p><u>Strategic drainage bullet point:</u> We highlighted at MIR stage that no reference was made to waste water drainage in Findon which is in part is served by Nigg WWTW. All new development in this settlement will be required to connect to the waste water network. Therefore, for consistency, we request a drainage bullet point is added to this settlement text. We request it is confirmed with Scottish Water that the proposed population growth is within the design criteria for the existing waste water infrastructure at Nigg and, if so, that this is confirmed in the strategic drainage bullet point or, if not, the need for an upgrade must be highlighted.</p>		
OP1: South of Earnsheugh Terr	11 homes	No SEPA issues with allocation text
FORDOUN		
<p><u>Flood risk bullet point:</u> We request the following bullet point is added to the settlement text:</p> <ul style="list-style-type: none"> • A Flood Risk Assessment may be required for BUS2 site to assess possible fluvial and surface water flood risk. There may be a culverted watercourse on site which will require a development buffer along its length. Buffer strips will be required along all other watercourses and consideration should be given to their enhancement through renaturalisation and the removal of manmade features. <p><u>Strategic drainage bullet point:</u> As both Auchenblae and Fordoun waste waters pump to Laurencekirk, we request the status of waste water capacity (network and treatment plant) to take this additional flow is confirmed in the settlement text after consultation with Scottish Water and, if required, the need for an upgrade of waste water infrastructure highlighted in this bullet point.</p>		
OP1: Station Road	15 homes	No SEPA issues with allocation text
BUS1	Business	No SEPA issues with allocation text
BUS2	Business	<p>We do not appear not been consulted on this allocation previously in the Plan consultation process.</p> <p><u>Flood risk:</u> We have requested a separate flood risk bullet point for this allocation – see above.</p>

		<p><u>Contamination:</u> We also request the following wording is added to the allocation text box due to the site being located entirely within the former RAF Fordoun: “This site is entirely on the former Fordoun Airfield. The site is a former military airfield. Given the site’s former use as a military airfield radium 226 may be present due to its use in aircraft dials during WWII we request a requirement in the allocation text stating: An assessment of the site for potential radioactive substances is required prior any development.”</p> <p><u>Drainage:</u> In addition, we request the following wording is added to either the BUS2 allocation text or added to the Strategic drainage bullet point: “This site (BUS 2) is not served by a public waste water system and the receiving water is a small burn with low dilution. Additional development may not be possible with private waste water treatment.”</p>
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GOURDON

Flood risk bullet point: We request, for consistency, minor rewording of the bullet point to:

- Parts of ... flooding. **Flood risk Assessments may be required**

Strategic drainage bullet point: No comment

OP1: Land at Braehead	49 homes	No SEPA issues with allocation text
OP2: E of Linton Business Park	Employment	No SEPA issues with allocation text
R1	Cemetery	No SEPA issues with allocation text
BUS	Business	No SEPA issues with allocation text

INVERBERVIE

Flood risk bullet point: We request, for consistency, minor rewording of the bullet point to:

- Parts of the settlement may be at risk from coastal flooding **and flooding from the Bervie Water. Flood risk Assessments may be required**

Strategic drainage bullet point: No comment

OP1 Land South of West Park	200 homes	No SEPA issues with allocation text
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JOHNSHAVEN

Flood risk bullet point: We request, for consistency minor rewording of the bullet point to:

- Parts of the settlement ~~may be~~ **are** at risk of coastal, **fluvial and/or surface water** flooding. **Flood risk Assessments may be required.**

Strategic drainage bullet point: No comment

OP1: Golden Acre	67 homes	No SEPA issues with allocation text
R1	Education	No SEPA issues with allocation text
R2	Cemetery	We note this is a new site in the Plan and we have not been previously consulted on it. However, there are unlikely to be any SEPA issues with this site being allocated as a cemetery

KIRKTON OF DURRIS

Flood risk bullet point: We **request** the following **bullet point is added to the settlement text:**

- **Parts of the settlement are at risk from flooding from the River Don and Burn of Sheecho. Flood Risk Assessments may be required.**

Strategic drainage bullet point: We **request**, for consistency the existing bullet point is **replaced** with:

- **There is no public waste water infrastructure in Kirkton of Durris.**

KIRKTON OF MARYCULTER

Flood risk bullet point: n/a

Strategic drainage bullet point: No comment

OP1	6 homes	No SEPA issues with allocation text
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LAURENCEKIRK

Flood risk bullet point: We **request** the **deletion of the third bullet point** referring to R1 and that the **second and fourth bullet points are amalgamated** into the following:

- **All OP site and R1 site have a watercourse flowing through or adjacent to them. Flood Risk Assessments will be required.**

We also **request** the following **separate bullet point for SR1:**

- **Due to the possibility of a number of culverted watercourses on site SR1, a Flood Risk Assessment will be required. The opening up and environmental enhancement of these watercourses should be investigated in the Flood Risk Assessment. Buffer strips will be required along the length of the watercourses. No development will be permissible on a culverted watercourse.**

Strategic drainage bullet point: No comment

OP1: North Laurencekirk	310 homes	We request the following rewording in the second paragraph: "...Water Impact Assessment, Flood Risk Assessment , Landscape Plan and an Environmental Statement. A Flood Risk Assessment may also be required. In addition we request the addition of the following wording in the fourth paragraph: "...be investigated and should be supported in the Flood Risk Assessment. The Flood Risk Assessment will be required to assess the risk from the small watercourse in the western area and along the eastern boundary and consideration should be given to any culverts/bridges which may exacerbate flood risk. "
OP2: Off Blackiemuir Ave/East of Westmuir	210 homes	We request the following rewording in the third paragraph: "...be investigated and should be supported in a Flood Risk Assessment. The Flood Risk Assessment will be required to assess the risk from the Gaugers Burn and consideration should be given to any culverts/bridges which may exacerbate flood risk. "
OP3: North of Fordoun Road	247 homes	We request the following rewording in the first paragraph: "...Water Impact Assessment, Flood Risk Assessment , Landscape Plan and an Environmental Statement. A Flood Risk Assessment may also be required.
OP4: North of Gardenston St	20 homes	We request the following rewording in the second paragraph: "A Flood Risk Assessment may will be required to assess the risk from the Gaugers Burn and consideration should be given to any culverts/bridges which may exacerbate flood risk. "
OP5: Land South End of Gardenston St	11 homes	We request the addition of the following wording in the second paragraph and the first sentence in the third paragraph deleted: "...be investigated and should be supported in a Flood Risk Assessment. The Flood Risk Assessment will be required to assess the risk from Gaugers Burn and consideration should be given to any culverts/bridges which may exacerbate flood risk. "
OP6: Land South of High St	100 homes/ commercial	We request the addition of the following wording in the third paragraph: "...the development. A Flood Risk Assessment will be required to assess the risk from Gaugers Burn and consideration should be given to any culverts/bridges which may exacerbate flood risk. "

OP7: Land West of Fordoun Rd	15 homes	We request the following rewording in the last sentence of the second paragraph: “A Flood Risk Assessment may will be required to assess the risk from the small watercourses to the east.
OP8: Land East of Laurencekirk	Employment	We request the following rewording in the second paragraph: “...Water Impact Assessment, Flood Risk Assessment , Landscape Plan and an Environmental Statement. A Flood Risk Assessment may also be required.
SR1		We request the addition of the following wording in the allocation text box: “...the development. A Flood Risk Assessment will be required to assess the risk from Gaugers Burn and consideration should be given to any culverts/bridges which may exacerbate flood risk. ”
R1	Cemetery	There are unlikely to be any SEPA issues with this site continuing to be allocated as a cemetery
R2	Community	No SEPA issues with allocation text
R3	Education/ community	See comment on the flood risk bullet point above.

LUTHERMUIR

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1: The Chapel	31 homes	We request the following rewording in the second paragraph: “...features including culverts should be investigated and should be supported in a Flood Risk Assessment. No development will be permissible on the culverted part of the watercourse. A Flood Risk Assessment will also be required. ”
OP2: South of Newbigging Cottages	25 homes	We request the following rewording in the last sentence in the first paragraph: “A Flood Risk Assessment may will be required. The enhancement of the watercourse through re-naturalisation and the removal of any redundant features including culverts should be investigated and should be supported in a Flood Risk Assessment. No development will be permissible on the culverted part of the watercourse. ”
OP3: North of Church road	13 homes	No SEAP issues with allocation text

MARYKIRK

Flood risk bullet point: We **request the removal of the second bullet point** referring to an FRA requirement for OP1 (see comment on allocation text below)

Strategic drainage bullet point: We **query** whether the wording is correct in reference to the growth project to investigate additional capacity? We **recommend this is reworded** in consultation with Scottish Water.

OP1: Land to the West of Marykirk	30 homes	We request the removal of the third paragraph from the allocation text as there is only a small watercourse to the north flows away from site and allocation site boundary is away from this small watercourse. There little risk of flooding from this source. Any flood risk issues would be surface water related and we therefore recommend the following additional wording with agreement from the Council’s FPU : “ Any surface water flooding should be addressed with appropriate SUDS measures ”
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MARYWELL

Flood risk bullet point: We **question the need for the second bullet point** as we are not aware of any flood risk issues on site. If the Council’s FPU confirm there is a surface water issue it should be confirmed if this can be addressed through appropriate SUDS. If not, and they confirm a FRA is required, we request the following additional wording to the second bullet point:

<ul style="list-style-type: none"> Part of OP1...vulnerable to surface water flooding. A” <p>Strategic drainage bullet point: No comment</p>		
OP1: Land East of Old Stonehaven Rd	52 homes	Please refer to our comment above regarding the second flood risk bullet point. <u>If</u> a Flood risk assessment is required or <u>if</u> surface water flooding needs to be addressed through SUDS, we recommend this should be highlighted in the allocation text.
BUS1: Land at Mains of Cairnrobin	Business	No SEPA issues with allocation text
BUS2: Land at Blackhills of Cairnrobin	Mineral extraction	We request the following additional wording to the allocation text: “A peat survey is required for the area of possible basin peat and peaty gleys to the southwest part of the site. A Phase 1 habitat survey will also be required”
<p>MUCHALLS</p> <p>Flood risk bullet point: n/a</p> <p>Strategic drainage bullet point: Any development in this settlement will be required to connect to the existing waste water network. We therefore request the addition of a strategic drainage bullet point in the settlement text for consistency and request Scottish water confirm the capacity of its infrastructure in this settlement and wording of the bullet point is agreed accordingly.</p>		
<p>NEWTONHILL</p> <p>Flood risk bullet point: We request, for consistency, the two bullet points are reversed in order and the general bullet point is reworded as follows:</p> <ul style="list-style-type: none"> Parts of the settlement may be at risk from coastal flooding and flooding from the Burn of Elsick and the Pheppie Burn. Flood risk Assessments may be required. <p>Strategic drainage bullet point: No comment</p>		
OP1: Park Place	121 homes	No SEPA issues with allocation text
OP2: West of the A92	employment	No SEPA issues with allocation text
OP3: West Monduff	Employment	No SEPA issues with allocation text
<p>PARK</p> <p>Flood risk bullet point: n/a</p> <p>Strategic drainage bullet point: We request the last sentence in this bullet point is deleted.</p>		
OP1: West of Park Village Hall	6 homes	We request the following text is added to the first sentence in the second paragraph: “...sought with connection to the public sewer network 0.5km away”
<p>PORTLETHEN</p> <p>Flood risk bullet point: We request, for consistency with the allocation texts, that sites OP2 and OP5 are added to the second bullet point and it is replaced with the following:</p> <ul style="list-style-type: none"> Sites OP2, OP3, OP4 and OP5 are at risk from flooding due to one or more watercourses flowing through or adjacent to the site. A Flood Risk Assessment will be required. <p>We also request the third and fourth bullet points are reworded as follows:</p> <ul style="list-style-type: none"> Sites R1 and BUS 1 have watercourses flowing through or close to the site. A Flood Risk Assessment may be required. 		

- A significant proportion of site BUS 2 is at flood risk from the small watercourses flowing through the site and this may be a major constraint to any further development on site. A Flood Risk Assessment will be required to determine the developable area. Buffer strips will be required along the watercourses and opportunities to enhance the watercourses through renaturalisation and removal of any redundant manmade features should be investigated.

Strategic drainage bullet point: No comment

OP1: Schoolhill	60 homes/ School/park	No SEPA issues with allocation text
OP2: Land to Northwest of Badentoy	Employment	We query the need for a FRA for this site and note it doesn't appear in the flood risk bullet points. We are not aware of any flood risk issues. If the Council's FPU confirm there is a surface water issue it should be confirmed if this can be addressed through appropriate SUDS. If not, and they confirm a FRA is required, we request the following additional wording to the allocation text: "..., Flood Risk Assessment (to address surface water flooding),..."
OP3: Fairview Central	Employment	Due a change in the allocation site boundary since from the MIR stage, we request the deletion of the last sentence in the last paragraph referring to peat.
OP4: Fairview	Employment	We request the last sentence in the second paragraph is replaced with the following: " There is likely to be peat underlying a significant part of the site. A Peat Survey and Phase 1 Habitat survey will be required. "
OP5: South of Portlethen Club House	Health club	See comment above in relation to the first flood risk bullet point
OP6: Land East of Badentoy	Retail	No SEPA issues with allocation text
CC1: The Green	Community	No SEPA issues with allocation text
R1	Park and Ride	No SEPA issues with allocation text
R2	Lorry Park	No SEPA issues with allocation text
R3	School extension	No SEPA issues with allocation text
BUS1	Business	No SEPA issues with allocation text
BUS2	Business	See comment above in relation to the fourth flood risk bullet point

PORTLETHEN VILLAGE (no allocated sites)

Flood risk bullet point: No comment

Strategic drainage bullet point: Any development in this settlement will be required to connect to the existing waste water network. We therefore **request** the addition of a strategic drainage bullet point in the settlement text for consistency and **request** Scottish water confirm the capacity of its infrastructure in this settlement and wording for the bullet point is agreed accordingly.

ROADSIDE OF KINNEFF

Flood risk bullet point: n/a

Strategic drainage bullet point: No comment

OP1: West of Roadside of Kinneff	46 homes	No SEPA issues with allocation text
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St CYRUS

Flood risk bullet point: We **query the need for the flood risk bullet point**; we **recommend** this bullet point is **deleted**. Construction is now well underway on this site which had a surface water flooding issue that could be addressed by SUDS.

Strategic drainage bullet point: Whilst we note the Proposed Plan text, we highlight St Cyrus waste water pumps to Nether Knox which currently treats screened sewage only. Any further development at St Cyrus will require improved treatment at Nether Knox. We therefore **request it is confirmed with Scottish that the proposed population growth is within the design criteria for the existing waste water infrastructure** and, if so, this is confirmed in the strategic drainage bullet point or, if not, the need for an infrastructure upgrade must be highlighted.

OP1: Roadside	125 homes	See comment above regarding the flood risk bullet point. We note there is no FRA requirement in the allocation text.
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STONEHAVEN

Flood risk bullet point:

We **recommend**, for consistency, the **first two bullet points are amalgamated** together:

- Stonehaven lies...National Flood Risk Assessment. **Parts of the settlement are also at risk from coastal flooding.** Flood risk Assessments may be required.

We also **recommend** the following **amalgamation of the other bullet points** in the settlement text:

- **Sites OP1, OP2, OP3 and OP6 lie within or adjacent to SEPA's 1:200 flood risk area or have watercourses flowing through or adjacent to them. Flood Risk Assessments may be required.**
- **BUS3 site is adjacent to a small watercourse. A buffer strip will be required alongside the watercourse and a Flood Risk Assessment may be required.**

Strategic drainage bullet point: No comment

OP1: Carron Den	155 homes	See comment above regarding the flood risk bullet point. We note there is no FRA requirement in the allocation text.
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OP2: Ury House East Lodge	212 homes	No SEPA issues with allocation text
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OP3: Ury House Blue Lodge	99 homes	We recommend sentence referring to the FRA be in added to the paragraph above it.
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OP4: Adjacent to Kirkton of Fetteresso	50 homes	No SEPA issues with allocation text
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OP5: Land at East Lodge	60 homes	No SEPA issues with allocation text
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OP6: Mackie Village Ury	91 homes	No SEPA issues with allocation text
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Estate		
OP7: East Newtonleys	Employment	No SEPA issues with allocation text
BUS1	Business	No SEPA issues with allocation text
BUS2	Business	No SEPA issues with allocation text
BUS3	Business	We have recommended rewording of this bullet point – see above
R1	Cemetery	There are unlikely to be any SEPA issues with this site continuing to be allocated as a cemetery
WEST CAIRNBEG		
Flood risk bullet point: n/a		
Strategic drainage bullet point: We request the existing bullet point is replaced by the following wording: “West Cairnbeg lies with a SEPA Waste Water Drainage Consultation Area and the existing private communal waste water treatment is at capacity. Any further private drainage is unlikely to be authorised by SEPA.”		
R1	Community	No further SEPA comments other than the drainage concerns above.
WOODLANDS OF DURRIS		
Flood risk bullet point: n/a		
Strategic drainage bullet point:		
OP1: North West of Clune Gdns	27 homes	No SEPA issues with allocation text

MARR

PROPOSED PLAN REFERENCE	PROPOSAL	SEPA REVIEW AND REQUESTED MITIGATION/DEVELOPER REQUIREMENT
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ABOYNE

Flood risk bullet point: We recommend, for consistency, OP2 site is also included in the second bullet point:

- A Small watercourses **flow through or adjacent to** sites OP1 and OP2. A Flood Risk Assessment may be required.

Strategic drainage bullet point: No comment

OP1: Land West of Tarland Road	Mixed	No SEPA issues with allocation text
OP2: Tarland Road North of Kinord Drive	181 homes	No SEPA issues with allocation text

ALFORD

Flood risk bullet point: We **request**, due to the area not being PVA in the nFRA, the **first bullet point is replaced** with the following:

- **Parts of Alford are shown to be at risk from flooding on the SEPA Indicative Flood Map. Flood Risk Assessments may be required.**

We also request, for consistency, sites OP3 and OP5 are added to and R1 removed (no watercourse apparent on SEPA GIS) from the second bullet point which requires minor rewording:

- **Part of the site Sites OP1, OP3, OP4 and OP5 ~~R1~~ have small watercourses running flowing through or adjacent to them and. Flood Risk Assessments may be required.**

Strategic drainage bullet point: No comment

OP1: School Campus Site	Mixed	No SEPA issues with allocation text
OP2: Land at Wellheads	Mixed	No SEPA issues with allocation text
OP3: Land at Greystone Road	259 homes	No SEPA issues with allocation text
OP4: Kingsford Road, Alford	85 homes	No SEPA issues with allocation text
OP5: Wellheads E. of Castle Rd	60 homes	No SEPA issues with allocation text

OP6: Site East of Parkview	Employment	No SEPA issues with allocation text
R1	Cemetery extension	There are unlikely to be any SEPA issues with this site
R2	Community Care	No SEPA issues with allocation text as above
<p>BANCHORY</p> <p><u>Flood risk bullet point:</u> Due to a significant issue with surface water flooding which we highlighted at the MIR stage, we highly recommend a separate bullet point is added for this site:</p> <ul style="list-style-type: none"> <p style="text-align: right;">Site R4 is at significant risk from surface water flooding. A Flood Risk Assessment will be required to determine how this can be managed.</p> <p>We also request OP5 is added to the second bullet point and additional wording added to the third bullet point:</p> <ul style="list-style-type: none"> <p style="text-align: right;">Part of OP1, OP2, OP3, OP4 and OP5 are....A Flood Risk Assessment...will be required for OP2 and OP4 and may be required for OP1, OP3 and OP5.</p> <p style="text-align: right;">Small watercourses...may be required. Buffer strips will be required alongside the watercourses.</p> <p><u>Strategic drainage bullet point:</u> No comment</p>		
OP1: East Banchory/ Eco Village	Mixed	No SEPA issues with allocation text
OP2: Lochside of Leys	Mixed	No SEPA issues with allocation text
OP3: Lochside of Leys	50 homes	No SEPA issues with allocation text
OP4: Hill of Banchory	15 homes	No SEPA issues with allocation text although the FRA requirement should be emphasised in the second bullet point – see above
OP5: Hill of Banchory East	Retail	We request this site is added to the flood risk bullet point – see above. As the site does not have a watercourse flowing through it, we request the third sentence in the last paragraph is removed.
OP6: Land at former Glen O'Dee Hospital,	40 homes	Due to only surface water issues on this site the FRA is not a SEPA requirement. We note the SFRA states the surface water flooding can be addressed through SUDS. We recommend the Council FPU confirm if this is the case or whether a FRA is required as currently stated in the allocation text. If the latter, site OP6 should be added to the settlement flood risk bullet points. If a FRA isn't required, this requirement should be removed from the allocation text and the following text, or similarly worded, added: "This site is at risk from surface water flooding that should be addressed through appropriate SUDS measures."
R1 Banchory GP & NHS Clinic	Vistors centre	No SEPA issues with allocation text
R2	Cemetery extension	We have no record of being consulted on this site previously. Due to the close proximity of the River Dee to this site, we request the following text is

		added to the allocation text: “Due to close proximity and likely hydraulic connectivity of this site to the River Dee, a detailed groundwater assessment will be required to fully assess the suitability of this site as a cemetery.”
R3	Education	No SEPA issues with allocation text
R4	Health centre	Although SEPA has no requirement for a FRA, we wish to highlight the scale of the surface water flood risk on this site may be difficult to manage. We have therefore recommended a separate flood risk bullet point is added to the settlement text to highlight this issue.
BUS1	Business	We have requested minor rewording to the relevant flood risk bullet point – see above
CAIRNIE		
Flood risk bullet point: n/a		
Strategic drainage bullet point: No comment		
OP1	8 homes	We highlighted at the MIR stage that the proximity to the existing sewage works may cause odour issues and that your environmental health colleagues should advise on a suitable buffer width for the site. However, there appears to be no mention of a buffer requirement in the allocation text. We highly recommend an addition of a requirement in the allocation text to provide a suitable buffer from the sewage works on the eastern side of the site.
CLATT		
Flood risk bullet point: We recommend, for consistency, a general flood risk bullet point is added:		
<ul style="list-style-type: none"> Flood Risk Assessments may be required. 		
Strategic drainage bullet point: No comment		
CRAIGWELL (DESS)		
Flood risk bullet point: n/a		
Strategic drainage bullet point: No comment		
R1	Recycling facility	No SEPA issues with allocation text
CRATHES		
Flood risk bullet point: n/a		
Strategic drainage bullet point: We recommend the following additional text – “...in Banchory. Any future development will be expected to do the same. ”		
DRUMBLADE		
Flood risk bullet point: n/a		
Strategic drainage bullet point:		
OP1: South West of Drumblade Primary School	5 homes	We request the last paragraph in this allocation text is replaced with: “A single private water treatment plant, built to an adoptable standard, will be required for this site.”
FINZEAN		

Flood risk bullet point: n/a		
Strategic drainage bullet point:		
OP1: Site to East of Finzean Village Hall	8 homes	We request the last paragraph in this allocation text is replaced with: “A single private water treatment plant, built to an adoptable standard, will be required for this site.”
FORGUE		
Flood risk bullet point: We recommend, for consistency, a general flood risk bullet point is added:		
<ul style="list-style-type: none"> Forgue. Flood Risk Assessments may be required. 		Parts of Forgue are at possible risk from flooding from the Burn of
Strategic drainage bullet point: For consistency, we request the following minor rewording : “There is no public waste water treatment infrastructure in Forgue ”		
OP1: Land to East of the Rectory	5 homes	We request the second paragraph is removed and replaced with: “ A single waste private water treatment plant, built to an adoptable standard, will be required for this site. It will be preferable for the provision of one treatment plant to service both OP1 and OP2. ”
OP2: Chapelhill	5 homes	We request the last paragraph is removed and replaced with: “ A single private waste water treatment plant, built to an adoptable standard, will be required for this site. It will be preferable for the provision of one treatment plant to service both OP1 and OP2. ”
GARTLY		
Flood risk bullet point: We recommend, for consistency, a general flood risk bullet point is added:		
<ul style="list-style-type: none"> Water. Flood Risk Assessments may be required. 		Parts of Gartly are at possible risk from flooding from the Bogie
Strategic drainage bullet point: No comment		
GLASS		
Flood risk bullet point: We recommend, for consistency, a general flood risk bullet point is added:		
<ul style="list-style-type: none"> Water. Flood Risk Assessments may be required. 		Parts of Glass are at possible risk from flooding from the Markie
Strategic drainage bullet point: No comment		
R1	Park and car park	No SEPA issues with allocation text
GLENKINDIE		
Flood risk bullet point: We recommend, for consistency, a general flood risk bullet point is added:		
<ul style="list-style-type: none"> area shown on SEPA Indicative Flood Map. Flood Risk Assessments may be required. 		Parts of Glenkindie are adjacent to the River Don 1 in 200 year flood
Strategic drainage bullet point: No comment		
OP1: West of Bowling Club	6 homes	No SEPA issues with allocation text
HUNTLY		
Flood risk bullet point: No comment		

Strategic drainage bullet point: No comment		
OP1: Steven Road, Huntly	50 homes	No SEPA issues with allocation text
OP2: Deveron Road, East of A96	52 homes	No SEPA issues with allocation text
OP3: Adjacent to Linnorie	Employment	No SEPA issues with allocation text
OP4: Adjacent to Linnorie Business Park	Employment	No SEPA issues with allocation text
OP5: The Ward	Employment	No SEPA issues with allocation text
R1	Community use	No SEPA issues with allocation text
BUS1	Business	No SEPA issues with allocation text
BUS2	Business	No SEPA issues with allocation text
BUS3	Business	No SEPA issues with allocation text
BUS4	Business	No SEPA issues with allocation text
INCHMARLO		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: Inchmarlo Care Community	60 homes	No SEPA issues with allocation text
OP2: South East of Glencommon Wood	120 homes	Due to the boundary change from MIR to Proposed Plan stage we recommend the following minor rewording of the second sentence in fourth paragraph: "A Flood Risk Assessment...due to a small watercourse running through adjacent to the site."
OP3: East Mains and Auldeer Wood	75 homes	No SEPA issues with allocation text
KEIG		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		

OP1: Land North of Braehead	11 homes	No SEPA issues with allocation text
KENNETHMONT		
<u>Flood risk bullet point:</u> No comment		
<u>Strategic drainage bullet point:</u> No comment		
OP1: Land South of B9002	30 homes	No SEPA issues with allocation text
OP2: Land Opposite the School	Employment	No SEPA issues with allocation text
R1	Car park	No SEPA issues with allocation text
KINCARDINE O'NEIL		
<u>Flood risk bullet point:</u> No comment although see comment below regarding OP1		
<u>Strategic drainage bullet point:</u> No comment		
OP1: Land at Haugh Farm	Mixed	Due to only surface water issues on this site the FRA is not a SEPA requirement. We note the SFRA states the surface water flooding can be addressed through SUDS. We recommend the Council FPU confirm if this is the case or whether a FRA is required as currently stated in the allocation text. If the latter, site OP6 should be added to the settlement flood risk bullet point. If a FRA isn't required, this requirement should be removed from the allocation text and the following text, or similarly worded, added: "This site is at risk from surface water flooding that should be addressed through appropriate SUDS measures."
OP2: Cook School	Employment	No SEPA issues with allocation text
OP3: Land at Gallowhill Road	8 homes	No SEPA issues with allocation text
BUS	employment	No SEPA issues with allocation text
KIRKTON OF TOUGH		
<u>Flood risk bullet point:</u> n/a		
<u>Strategic drainage bullet point:</u> We request the following minor rewording of this text to – "There is no public waste water treatment infrastructure available"		
LOGIE COLDSTONE		
<u>Flood risk bullet point:</u> No comment		
<u>Strategic drainage bullet point:</u> No comment		
OP1: Adjacent to hall	10 homes & community	No SEPA issues with allocation text

LUMPHANAN

Flood risk bullet point: We request, for consistency, that OP1 is added to the flood risk bullet point as the same watercourse flows adjacent to it and recommend the following rewording:

- A small watercourse flows adjacent to site OP1 and R1. Flood Risk Assessment may be required.

Strategic drainage bullet point: No comment

OP1: Land at Milan Park	26 homes	No SEPA issues with allocation text but request the site is included in the flood risk bullet point.
R1	Community	No SEPA issues with allocation text

LUMSDEN

Flood risk bullet point: We request the following additional wording to the bullet point:

- A small watercourse runs flows adjacent to the BUS site and **buffer strips will be required alongside it.** A Flood Risk Assessment may be required.

Strategic drainage bullet point: No comment

BUS	Business	We have requested additional text to the flood risk bullet point – see above
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MONYMUSK

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

MUIR OF FOWLIS

Flood risk bullet point: We **request** the following **additional wording** to the bullet point:

- Sites...Burn. **Buffer strips will be required alongside the watercourse.** A Flood Risk Assessment may be required.

Strategic drainage bullet point: No comment

OP1: Land opposite Manse	6 homes	No SEPA issues with allocation text
BUS	Business	We appear not to have been consulted on the retention of this site at MIR stage. Any further development on this site will be required to provide a suitable buffer between the Leochal Burn to mitigate not only against flood risk but also against the possible natural migration of the Burn. We have therefore requested a buffer strip requirement is added to the flood risk bullet point above.

RHYNIE

Flood risk bullet point: No comment

Strategic drainage bullet point: No comment

OP1:	34 homes	No SEPA issues with allocation text
BUS	Business	No SEPA issues with allocation text

RUTHVEN		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: School Road	8 homes	No SEPA issues with allocation text
STRACHAN		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: Land at Gateside Cottage	15 homes	No SEPA issues with allocation text
TARLAND		
Flood risk bullet point: We request , for consistency, that OP2 is added to the second flood risk bullet point		
Strategic drainage bullet point: No comment		
OP1: MacRobert Trust Estate Yard	Mixed	No SEPA issues with allocation text
OP2: Land Adjacent to Alastrean House	10 homes	Flood risk: We request this site is added to the second flood risk bullet point to highlight a FRA may be required. Drainage: We request , due to this site having an existing private waste water treatment facility, the following text is added to this allocation text: “Should the existing private waste water drainage system not have capacity for this additional population growth, an upgrade to the existing system or connection to the Scottish Water system will be required.”
OP3: Village Farm		No SEPA issues with allocation text
R1	Cemetery extension	No comment as we have previously seen as APP/2017/3107
TORPHINS		
Flood risk bullet point: No comment		
Strategic drainage bullet point: No comment		
OP1: Station Garage	Mixed	
R1	Hall extension	Whilst we note the SFRA required a FRA we confirm we have no issues in terms of flood risk for this site.
R2	Cemetery extension	Due to the close proximity of the Beltie Burn to this site we request the following text is added to the allocation text : “Due to the likely hydraulic connectivity of this site to the Beltie Burn, a detailed groundwater assessment will be required to fully assess the suitability of this site as a cemetery.”
TOWIE		
Flood risk bullet point: No comment		
Strategic drainage bullet point: We request the following minor rewording of this text to – “There is no public waste water treatment infrastructure available”		

OP1: Adjacent to the Hall	4 homes	We request the second paragraph is removed and replaced with the following: “ A single private water treatment plant, built to an adoptable standard, will be required for this site ”.
WHITEHOUSE <u>Flood risk bullet point:</u> No comment <u>Strategic drainage bullet point:</u> We request the following minor rewording of this text to – “There is no public waste water treatment infrastructure available ”		
BUS	Business	No SEPA issues with allocation text with allocation text.

PCS170943 APPENDIX 3: SEPA COMMENTS ON ABERDEENSHORE PROPOSED PLAN 2020 – SUPPORTING DOCUMENTS

Habitats Regulations Appraisal

We have no comments to make on this document

Equality Impact Assessment

We have no comments to make on this document

Strategic Flood Risk Assessment (SFRA)

We welcome the inclusion of the assessment of the sites carried forward into the Plan. We are generally **supportive** of SFRA. However, we highlight our potential objections in relation to flood risk which are laid out in sections 2.2 and 2.3 in Appendix 2 of this response.

We also note some discrepancies between the allocation requirements set out in the SFRA and those carried forward into the Plan. We have highlighted these in our response table in Appendix 2 of this response where we think it is important for the SFRA requirements to be carried forward into the Plan.

Monitoring Report November 2019

We note this report.

Proposed Delivery Programme

We welcome the inclusion of the Proposed Delivery Programme in the documents supporting the plan. This will obviously need updating before the Plan is adopted. We would welcome the opportunity to work with the Council in finalising this Delivery Programme once all the developer requirements and allocations have been finalised.

In addition to any amendments arising in the finalisation of the Plan, there are a number of modifications we will wish to see in relation to who is responsible for reviewing a FRA. In the case where a FRA is required because of surface water flooding only, then it will be the Council's Flood Prevention Unit (FPU) who should be identified as responsible. Similarly, in settlements where a Council Flood Study has been undertaken, either by the Council or undertaken by a party on their behalf, the Council's FPU should be identified as responsible for any action relating to this study. Consequently, the Council's FPU should be added to Table 4 in the Delivery Programme and they should also be consulted on the revised Delivery Programme before it is finalised.

Development Planning and Management Transport Appraisal

We have no comments to make on this document



Chairman

Chief Executive

SEPA Aberdeen Office

