



ABERDEENSHIRE

Strategic Environmental Assessment

Post Adoption Statement
Local Development Plan 2023

January 2023

POST-ADOPTION STATEMENT FOR THE ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2023

PART 1

To

SEA.gateway@gov.scot

SEA Gateway Team
Scottish Government
Area 2 H (South)
Victoria Quay
Edinburgh EH6 6QQ

PART 2

A SEA Environmental Report is attached for the plan entitled

Aberdeenshire Local Development Plan 2023

The Responsible Authority is:

Aberdeenshire Council

PART 3

Contact Name

Piers Blaxter

Job Title

Team Leader – Policy Planning

Contact Address

Woodhill House
Westburn Road
Aberdeen
AB16 5GB

Contact tel. no

01467 536230

Contact email

ldp@aberdeenshire.gov.uk

Signature

P. Blaxter

Date

12 January 2023

Contents

Cover Page.....	2
1. Purpose of the Post-Adoption Statement	4
2. Key Facts about the Aberdeenshire Local Development Plan 2023	5
3. Strategic Environmental Assessment Process	5
4. Effects of the Environmental Considerations on the LDP	6
5. Effects of the Environmental Report on the Plan	12
6. Taking Consultation Opinions into Account.....	26
7. Reasons for Adopting the Local Development Plan.....	172
8. Monitoring Measures	173
9. Conclusion.....	186

1. Purpose of the Post-Adoption Statement

- 1.1 Following the adoption of the Aberdeenshire Local Development Plan 2023, a Strategic Environmental Assessment (SEA) Statement is required under section 18(1)(b) of the [Environmental Assessment \(Scotland\) Act 2005](#). This 'SEA Statement', mostly known as a Post-Adoption Statement, must set out how the Responsible Authority (in this case, Aberdeenshire Council) took account of the findings of the Environmental Reports that were published for the Main Issues Report (2019) and the Proposed Aberdeenshire Local Development Plan (2020) (Proposed LDP), and the views expressed upon them during these consultation periods. In addition, the finalised Environmental Report had to be updated to reflect the changes recommended by the Reporters during the examination of the Proposed LDP, which concluded in June 2022. These Environmental Reports informed both the Proposed LDP (2020) and the adopted Aberdeenshire Local Development Plan (2023).
- 1.2 This Post-Adoption Statement is broken down into eight key sections, as follows:
 - a) Key facts about the Aberdeenshire Local Development Plan 2023.
 - b) A summary of the SEA process.
 - c) How the environmental considerations have been integrated into the Modified Proposed LDP.
 - d) How the environmental reports were taken into account.
 - e) How the opinions expressed in response to the Environmental Report consultations were considered.
 - f) How the results of relevant consultations were considered.
 - g) The reasons for choosing the LDP as adopted, in the light of the other reasonable alternatives considered.
 - h) The measures that are to be taken to monitor the significant environmental effects of the implementation of the adopted LDP.
- 1.3 A copy of the Post-Adoption Statement was emailed to the Consultation Authorities (NatureScot, Historic Environment Scotland and Scottish Environment Protection Agency) via the Scottish Government SEA Gateway on publication.

2. Key Facts about the Aberdeenshire Local Development Plan 2023

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

Table 1: Key Facts relating to the Aberdeenshire Local Development Plan

Name of Responsible Authority	Aberdeenshire Council
Title of the PPS	Aberdeenshire Local Development Plan 2023
What Prompted the PPS	Town and Country Planning (Scotland) Act 1997 (Planning etc (Scotland) Act 2006 and Planning (Scotland) Act 2019)
Subject	Land Use
Period Covered by the PPS	2022-2032
Frequency of Updates	Every 5 years
Area covered by the PPS	The whole of Aberdeenshire excluding Cairngorms National Park
Purpose and/or objectives of the PPS	The purpose of the LDP is to provide a framework for the sustainable development of land covering its area. It does not provide a framework for all development, only actions defined as "development" in legislation, and for which planning permission is a legal requirement.
Contact Point	Planning Policy Planning and Economy Environment and Infrastructure Services Aberdeenshire Council Woodhill House Westburn Road Aberdeen AB16 5GB TEL: 01467 532685

3. Strategic Environmental Assessment Process

3.1 As required under the Environmental Assessment (Scotland) Act 2005, the Aberdeenshire Local Development Plan 2023 (LDP) was subject to a Strategic Environmental Assessment (SEA). This process allowed Aberdeenshire Council to include the views of the Scottish Environment Protection Agency (SEPA), NatureScot (formerly Scottish Natural Heritage (SNH)), Historic Environment Scotland (HES) and Scottish Ministers regarding the scope and level of detail that was appropriate for the environmental report and its findings.

3.2 The Environmental Report was prepared in two stages. Firstly, an interim Environmental Report was produced to assess the impact of the Main Issues Report (MIR). Following consultation on the MIR and interim Environmental Report, a proposed LDP was prepared along with an accompanying Environmental Report. The Environmental Report that supported the Proposed LDP has evolved from the interim Environmental Report. The

Environmental Report has taken into account comments made during the consultation on the interim Environmental Report and the MIR. These comments influenced the development of the spatial strategy and policies contained in the Proposed LDP.

- 3.3 We consulted on the interim Environmental Report and the MIR for a period of 12 weeks from 14 January 2019 to 8 April 2019. Reasonable alternatives were considered and assessed in the Environmental Report as part of the development of the spatial strategy, policies and allocations. The SEA has led to the choice of preferred options for the LDP. We consulted on the Environmental Report and the Proposed LDP for a period of 8 weeks from 25 May to 31 July 2020. The Environmental Report was further updated following the conclusion of the Proposed LDP examination in 2022, to account for the Reporters recommendations.
- 3.4 The interim Environmental Report was made available online, in local libraries, Area Offices, and at the Council's headquarters. However, due to the Covid-19 pandemic and the restriction placed on visiting places during 2020, the environmental report was only available online.
- 3.5 The first step in preparing the Environmental Report was to collate the relevant baseline data relating to the current state of the environment and to identify what links exist between the LDP and other relevant policies, plans, programmes and environmental objectives. We then assessed the effects of options of the strategy, policies and sites on the environment. The assessment took into account all the baseline information, any existing environmental problems and the effects that future developments are likely to have on all environmental topics considered. Where we identified significant negative impacts from any aspects of the LDP, we devised mitigation measures to remove, reduce or compensate for the impacts on the environment. In almost all cases, this meant rejecting the policies, options or sites likely to have significant environmental effects. A monitoring plan forms part of the Environmental Report. It indicates the commitment of the Council to identify unforeseen adverse effects arising from the LDP at an early stage and to undertake appropriate remedial actions. This has been integrated into plans for monitoring the LDP itself.

4. Effects of the Environmental Considerations on the LDP

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

Table 2: Environmental Considerations and the Environmental Report

SEA Topic	Environmental Considerations	Integrated into the Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
Air quality	1. The need to address the link between traffic congestion and air pollution with a focus on having a consideration of the Air Quality Management Plan.	Yes	1. The Aberdeen City and Shire Strategic Development Plan 2020 (SDP) sets the requirements for housing and economic growth. The strategy is to create sustainable communities that reduce the need to travel and minimise the impact on air quality. This has been carried forward in the aims of the LDP. 2. The allocations proposed in the LDP seek to avoid worsening traffic issues in the larger settlements of Aberdeenshire.
Water quality	1. The importance of maintaining and improving water quality and water environment resulting from run off or the release of pollutants. 2. The importance of protecting species from disturbance and human use in areas of high sensitivity (River Dee and Ythan Estuary protected sites). 3. The need to ensure that water abstraction does not have negative effects on water quality. 4. The necessity of avoiding development on land at risk from flooding and the need to adapt to future climate impacts.	Yes	1. The LDP aims to protect and improve assets and resources and promote sustainable mixed communities, which are implemented through policies on developing on special rural areas, layout, siting and design, developer contributions, natural heritage and landscape, and protected resources. In addition, mitigation measures in the SEA will be taken into account when applications are considered. 2. In addition to the above policies, allocations are not proposed immediately adjacent to the most environmentally sensitive areas. 3. The capacity of the River Dee was considered in the SDP allocations. Thus, the Dee can accommodate additional abstraction whilst avoiding negative impact on water quality. 4. The LDP avoided allocating development located on land at risk from 1 in 200-year flood events or greater. There are exceptions to this, but these are included on the basis that development on these

SEA Topic	Environmental Considerations	Integrated into the Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
			<p>areas does not take place on the land at risk from flooding.</p> <p>5. Where the assessment has identified a significant flood risk these areas have been identified as open space.</p>
Climatic factors	<ol style="list-style-type: none"> 1. The relationship between increased burning of fossil fuel and climate change. 2. The necessity of minimising Aberdeenshire's global footprint. 3. The link between our contributions to the changing climate and potential future unpredictable weather events, hotter summers and wetter winters. 4. This link between climate change and increased risk of flood events. 5. The necessity of protecting land and properties vulnerable to future flood risk through adaptation 	Yes	<ol style="list-style-type: none"> 1. Policy C1 Using Resources in Buildings in the LDP sets requirements for low and zero carbon generating technologies to be included in all new development to reduce the predicted carbon emissions. 2. Policy PR3 Reduce, Recycling and Waste in the LDP also helps to manage resources. 3. The LDP avoided allocating development located on land at risk from 1 in 200-year flood events or greater. There are exceptions to this, but these are included on the basis that development on these areas does not take place on the land at risk from flooding (i.e. these areas are used as public open space).
Soil quality	<ol style="list-style-type: none"> 1. The need to avoid contamination of land through development and support development that remediates existing contaminated land. 2. The need to avoid the loss of soil from climate change and erosion, including prime agricultural land. 	Yes	<ol style="list-style-type: none"> 1. The LDP positively promotes the redevelopment of contaminated sites subject to remediation. 2. The LDP, through land use allocations and policies on flooding and erosion, and the protection of prime agricultural land seek to avoid development on the most sensitive locations.

SEA Topic	Environmental Considerations	Integrated into the Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
Biodiversity	<ol style="list-style-type: none"> 1. The necessity of reversing the decline in biodiversity as a result of land use, development and climate change. 2. The need to avoid development within the catchment of sites. 	Yes	<ol style="list-style-type: none"> 1. Generally, options in the Spatial Strategy and sites that are likely to have significant effects on designated sites have been rejected. Those options and sites that are within close proximity of sensitive sites are to be subject to additional assessments such as Habitats Regulations Assessment and Environmental Impact Assessment. 2. The LDP protects existing areas of green space in settlements to support biodiversity. Our natural heritage policy seeks improvements to be made to net biodiversity from new development .
Landscape	<ol style="list-style-type: none"> 1. Recognising the link between increased development and negative changes to the landscape features, their context, patterns of past use, and how they are valued and enjoyed by many people. 	Yes	<ol style="list-style-type: none"> 1. The LDP aims to facilitate positive change whilst maintaining and enhancing the distinctive character of Aberdeenshire's landscape. In particular, proposals have been avoided in prominent sites that will have a detrimental impact on the landscape or require strategic landscaping. 2. LDP appendix 13 on Aberdeenshire Special Landscape Areas seeks to protect Aberdeenshire's most locally valued landscapes.
Material assets	<ol style="list-style-type: none"> 1. The need to protect and enhance existing material assets and to be aware that development will put pressure on existing infrastructure but also create opportunities for acquisition of assets. 2. As the spatial strategy and the incremental expansion of existing settlements is the 	Yes	<ol style="list-style-type: none"> 1. The LDP identifies the required investment in material assets to support new development. 2. Further support is provided in Policies P1 Layout, Siting and Design, PR3 Reduce, Recycling and Waste and RD1 Providing Suitable Services on resource efficiency, as well as in future supplementary guidance on developer contributions.

SEA Topic	Environmental Considerations	Integrated into the Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
	<p>prescribed method of addressing growth in the LDP, linking development to existing infrastructure network does not only maximise resources but also addresses climate change problems.</p> <ol style="list-style-type: none"> 3. The link between recycling and use of material assets. 4. The potential for re-using recycled construction material. 		
Human health	<ol style="list-style-type: none"> 1. The link between urban green space and human wellbeing. 2. The link between sports and recreational facilities and active lifestyle of the population. 3. The link between multiple deprivation and worsening human health. 4. The link between, diabetes, high blood pressure, cardiovascular diseases and inactivity. 	Yes	<ol style="list-style-type: none"> 1. The LDP does not permit allocating development on sites where there would be a loss of urban open space or sports pitches unless improvements to existing facilities or new facilities are provided. Additionally, most of these sites are protected in the LDP. 2. The LDP allocates a greater proportion of housing and employment land in the four Regeneration Priority Areas than would normally be expected to help support regeneration, as well as housing to co-fund start-up businesses. 3. The LDP supports implementation of the parks and open space strategy to support human wellbeing, and sets out the requirement of public open space provision in new development, which is also stated in Appendix 10 of the LDP.
Population	<ol style="list-style-type: none"> 1. The need to support development that meets the needs of a future population, including jobs, homes and facilities. 	Yes	<ol style="list-style-type: none"> 1. The LDP makes significant housing and employment allocations to support the population. It makes clear how and when these will be delivered to always ensure a five-year

SEA Topic	Environmental Considerations	Integrated into the Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account
	2. The need to meet the needs of an increasing, ageing and diverse population in Aberdeenshire.		<p>effective supply of housing land and supply of employment land during the life of the plan.</p> <p>2. Where known, the settlement statements highlight what settlement infrastructure is likely to be required for some allocations,</p> <p>3. Policy on layout, siting and design requires for balanced mix of house and other building types, and land uses to meet the needs of Communities within Aberdeenshire.</p>
Cultural heritage	<p>1. The need to protect and, where appropriate, enhance or restore the historic environment, especially those on the Buildings at Risk Register.</p> <p>2. The necessity of improving the enjoyment and understanding of the historic environment.</p> <p>3. The need to recognise that future development could damage some historical features.</p>	Yes	<p>1. The LDP safeguards historic assets and incorporates guidance set out in Scottish Historic Environmental Policy, identifying Conservation Areas and Designed Landscapes, and considering the effects of new development areas on the historic environment and its setting.</p> <p>2. The LDP supports the appropriate development or use of historical buildings.</p> <p>3. Policies on layout, siting and design, enabling development, landscape, and protecting, improving and conserving the historic environment are some of the initiatives in the LDP.</p>

5. Effects of the Environmental Report on the Plan

- 5.1 The LDP sets the strategy for future development in Aberdeenshire and sets the policy framework to determine the suitability of proposals. A significant part of the strategy is the identification of specific sites for housing, employment, commercial centres, community uses and transport proposals. To allow for full consideration of the environmental impact of the LDP, assessments of all 600+ new proposals, and alternative housing and employment sites (bid sites) were undertaken. The environmental assessment has shown that most of the allocations are unlikely to have significant and/or cumulative effects on the environment. Where those sites were assessed to show likely significant effects on the environment, they were rejected or could be fully mitigated.
- 5.2 **Table 3** summarises how the environmental report has been taken into account within the LDP in accordance with Section 18 (3) (a-b) of the Environmental Assessment (Scotland) Act 2005. This table describes how the environmental report has been taken into account in the adopted LDP and what specific changes were made particularly where significant negative and cumulative effects were identified. In this case most of the significant negative effects were as a result of land use allocations. None of the aims and most of the policies of the LDP raised any significant negative effects.
- 5.3 The table below highlights when the mitigation is to be considered if there is the need for a more detailed assessment at a later stage in the planning process.

Table 3: Environmental Report

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
Air quality	<p>Allocation OP4 in Ellon for 29-hectare employment land could affect air quality due to its scale.</p> <p>The findings of the cumulative assessment show that houses in the countryside will increase carbon emissions, and could impact on air quality in key towns, as most rural locations do not have access to a regular bus service. In addition, more settlements have fewer services, which increases the use of the private car.</p> <p>Positive effects can be enhanced by facilitating the development of the park and ride facility in Portlethen, Banchory and Blackdog, public transport interchange hub in Fyvie, Oldmeldrum, Inverurie and community facilities to increase the use of public transport, and reduce car dependency, CO₂ levels, air pollution and nuisance in Strategic Growth Areas and larger settlements.</p>	Yes and No	<p>Aberdeenshire has no Air Quality Management Zones and the LDP makes the most efficient use of infrastructure to reduce the need for additional facilities and associated emissions, which focuses development in the strategic growth areas, and where there is a need. This will lessen this impact.</p> <p>While the LDP cannot prevent houses in the countryside where they meet Policy R2 Development Proposals Elsewhere in the Countryside, the policy is more restrictive for new development in the accessible rural area, and it limits the number of homes allowed during the Plan period.</p> <p>LDP Policy P1 Layout, Siting and Design seeks to deliver mixed use communities and reduce the need to travel. Policy PR3 Reuse, Recycling and Waste on locating waste facilities at appropriate locations.</p> <p>Policy P2 Open Space and Access in New Developments, and allocations identified in Appendix 7 (Settlement Statements) could require installation of</p>	<p>Through the Development management and EIA process.</p> <p>When preparing masterplans, local housing strategy, local transport strategy.</p>

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
			bus stop(s), and provision of paths to improve linkages (active travel). Policy PR2 Reserving and Protecting Important Development Sites and Appendix 7 (Settlement Statements) also safeguards public transport facilities identified in Aberdeenshire.	
Water quality	<p>Some development will have a negative impact on water quality, resulting in some water bodies failing to meet or retain their good ecological status due to diffuse or point source pollution or pressure on sewage works, and/or inappropriate SuDS.</p> <p>Some LDP allocations provide opportunities to enhance water courses through re-naturalisation of straightened watercourses.</p> <p>Some development will be susceptible to surface water runoff, which will have to be appropriately addressed through a Drainage Impact Assessment.</p> <p>Impact on water quality if new development connects to water</p>	Yes	<p>Policies R1 Special rural areas, P1 Layout Siting and Design, E1 Natural Heritage and PR1 Protecting Importance Resources will provide mitigation for the effects of development. Risk is identified for those allocations that have been identified as having a significant impact on water quality and they will be required to comply with these policies, including the needs for a drainage impact assessment, buffer strip and/or flood risk assessment.</p> <p>Resilience of future development near water bodies is also increased in Appendix 7 (the Settlement Statements) by using buffer strips next to water bodies, and measures to ensure they are positively integrated into the development, including re-naturalisation of straightened watercourses.</p> <p>In addition to the above policies, allocations are not proposed</p>	<p>Through the Development management and EIA process.</p> <p>When preparing masterplans.</p> <p>During the Habitats Regulation Assessment.</p>

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
	<p>and waste water infrastructure that is at or near capacity.</p> <p>In light of the above, the following sites were identified as having significant negative effects: Auchnaghatt OP1, Peterhead OP5, Hatton OP1, Newburgh OP2, Pitmedden and Milldale OP1, Stonehaven OP7, Inchmarlo OP2.</p>		<p>immediately adjacent to the most environmentally sensitive areas. In view of the potential significant negative impacts during implementation, EIA will be submitted before developments commence, and where appropriate, Habitats Regulation Assessment of sites that may impact on Natura sites, including the River Dee SAC and Ythan Estuary SAC, will be undertaken.</p> <p>A Habitats Regulation Assessment has been undertaken to ensure that the risk to the conservation status of the River Dee and Ythan Estuary SAC have been minimised, and policies are included in the plan to ensure that development does not affect their status.</p> <p>A Habitats Regulation Assessment will be required for developments near Natura sites.</p> <p>Policy RD1 Providing Suitable Services details the infrastructure requirements for new developments and where development cannot be accommodated in existing infrastructure there is a requirement to upgrade or provide new facilities.</p>	

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
			<p>Specific actions to mitigate environmental impacts are identified in Appendix 7a to 7f Settlement Statements for the identified allocations:</p> <ul style="list-style-type: none"> • Auchnaghatt OP1: As Auchnagatt and Annochie Place septic tank Waste Water Treatment Works (WWTW) does not have capacity, the proposal will need to connect to the public sewer. • Peterhead OP5: Buffer strips will be required along the watercourse and re-naturalisation and removal of any redundant structures. • Hatton OP1: Consider the use of SuDS and capacity of the WWTW, which is nearing its capacity. • Newburgh OP2: As the site is near the Ythan Estuary, Sands of Forvie and Meikle Loch SPA, a Construction Method Statement may be required. • Pitmedden and Milldale OP1: Pitmedden WWTW is not available for this site, but this is a reversible impact. • Stonehaven OP7: Consider cumulative effect of development on waste water drainage infrastructure in the area, and water connection as the site is between two supply zones. • Inchmarlo OP2: Consider alternative to private sewage treatment works, 	

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
			and proposals will be subject to a Habitats Regulations Appraisal to assess impacts on River Dee SAC.	
Climatic factors	<p>Effects on climatic factors in rural settlements can be reduced where land for a new/extension of a primary school is reserved (e.g. Memsie and Cruden Bay).</p> <p>Positive effects can be enhanced by facilitating large scale and/or mixed-use developments which can minimise car dependency and reduce CO₂ levels, air pollution and nuisance.</p> <p>Maximise resource efficiency and energy use in new buildings through good layout, siting and design in accordance with policy. Facilitate the creation of combined heat and power plants or other renewables in new developments at the masterplanning stage.</p> <p>Mitigate potential flood risk through drainage impact assessments or flood risk assessments and the provision of</p>	Yes	<p>The LDP makes the most efficient use of infrastructure to reduce the need for additional facilities and associated emissions, which focuses development where there is a need. However, in liaison with the Education Service, new development in rural locations have been supported where, for operational reasons, school closures are proposed, and preferred new sites have been identified.</p> <p>All sites substantially at risk from flooding have been removed from the plan and are included only as alternatives or as open space within an allocation.</p> <p>Policy P1 Layout, Siting and Design, Appendix 8 Successful Placemaking Design Guidance and Policy C1 Using Resources in Buildings seeks to reduce CO₂ emissions and energy use in buildings.</p> <p>Combined heat and power are encouraged by Policy C1.</p>	<p>Through the Development management and review of the LDP process.</p> <p>When developing Masterplans and Local Housing Strategy.</p>

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
	<p>appropriate buffer strips adjacent to water bodies.</p> <p>Mitigate against unsustainable settlement patterns through open space and links (paths) to the facilities in the settlement to maximise integration.</p> <p>Proposals permitted under Policy PR2 Reserving and Protecting Important Development Sites could have significant negative effects on several SEA topics as development in areas of flood risk (for example), but it must be shown the development is necessary in that location, and alternative locations should be evaluated.</p>		<p>Where the assessment has identified a significant flood risk these areas have been identified as open space. In addition, the LDP requires buffer strips adjacent to all water bodies. Also, for sites with an identified flood risk, each Settlement Statement highlights whether a flood risk assessment may or will be required.</p> <p>Active travel is promoted in policies B1 Town Centre Development, R2 Development Proposals Elsewhere in the Countryside, P1 Layout, Siting and Design and P2 Open Space and Access in New Development.</p> <p>Reserved sites and other proposals permitted under Policy PR2 that could have significant negative impacts may be subject to an Environmental Impact Assessment (EIA) Flood Risk Assessment, Habitats Surveys, Peat Surveys etc, which would be submitted with the planning application or before relevant developments can commence.</p>	
Soil quality	Some development will result in the loss of prime agricultural land, but this is in exceptional circumstances on sites allocated by the LDP. Nonetheless, the	No	Areas of land on prime agricultural land have generally not been included in the LDP for development. However, there are a handful of exceptions where the economic and social benefit would	Through the development management and EIA process.

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
	<p>result of development maximises the social benefits development on these would give to the community.</p> <p>Policy C2 Renewable Energy could have significant negative effects on soil from renewable energy installations.</p>		<p>outweigh the loss of prime agricultural land.</p> <p>The priority being given nationally to renewable energy justifies some loss of quality of soil. Development on peat is required to be fully justified using the Carbon Calculator.</p>	
Biodiversity	<p>The LDP protects biodiversity by minimising adverse impacts from development on designated sites, protected species and the wider biodiversity, requiring enhancement of biodiversity and creation of greenspace for wildlife.</p> <p>However, the following sites could affect biodiversity: Balmeldie OP3, Turriff OP1, Stonehaven OP3, and Banchory OP2, OP7 and R3.</p> <p>Policy PR3 Reuse, Recycling and Waste could also have significant negative effects on biodiversity depending on where these facilities are located.</p>	Yes	<p>Policy E1 Natural heritage sets out measures intended to protect and enhance biodiversity, and minimise any adverse impact as a result of all new development (e.g. ecological surveys).</p> <p>Specific actions to mitigate environmental impacts are identified in Appendix 7a to 7f Settlement Statements for the identified allocations:</p> <ul style="list-style-type: none"> Balmedie OP3: Consider impacts on Foveran Links Site of Special Scientific Interest and other environmentally designated sites in the wider area. Protected species and ecological surveys, mitigation measures where appropriate, and monitoring. Compensatory planting scheme and a Woodland Biodiversity Action Plan. Turriff OP1: Tree Protection Plan, minimise damage to Woods of Delgaty ancient woodland. 	Through the development management and EIA process.

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
			<p>Compensatory planting may be accepted.</p> <ul style="list-style-type: none"> • Stonehaven OP3: None as planning consent already granted and trees have been removed due to 2021/2022 storms. Impact on Garron Point SAC minimal given its proximity. • Banchory OP2: Avoid woodland loss unless necessary with equivalent compensatory planting provided, and updated Habitat and Ecological Survey and Mitigation Plan. • Banchory OP7: a landscape appraisal, tree survey; a habitat and ecological survey, and a mitigation plan. • Banchory R3: Minimise tree loss, and compensatory planting may be required. <p>Greater emphasis has been given to identifying, protecting and enhancing green-blue networks that are rich in biodiversity and connects paths and active travel routes through Policy P2.</p> <p>Water efficiency and the incorporation of water saving technologies has been promoted for all new development through Policy C1. In addition, this policy aims to sustain existing carbon stores (peat and woodland).</p>	

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
			Policy PR3 may justify the creation of waste facilities but all policies of the plan apply, and specific proposals will be judged against their potential effects on biodiversity.	
Landscape	<p>Maximise the integration of new development where it is out-of-scale of the existing settlement through open space (e.g. strategic landscaping and paths).</p> <p>The following sites could significantly affect this SEA topic: Cairnbulg and Inverallochy OP3, Balmedie OP3, Pitmedden and Milldale OP1, and Banchory OP2</p> <p>Policy PR3 Reuse, Recycling and Waste could have significant negative effects on landscape depending on where these facilities are located.</p> <p>Policy C2 Renewable Energy could have significant negative effects on landscape from renewable energy installations.</p>	Yes	<p>Policy E2 Landscape will be applied strictly to ensure that development does not have a significant effect on the landscape.</p> <p>Policy P2 Open space and access in new development requires new development to integrate with its surroundings through public open space and pathways.</p> <p>In most cases, bid sites that were expected to have the most significant impacts have not been included in the plan and are identified as alternatives. However, specific actions to mitigate significant negative landscape effects are identified in Appendix 7a to 7f Settlement Statements for the identified allocations:</p> <ul style="list-style-type: none"> • Cairnbulg and Inverallochy OP3: Landscape design and strategic planting. • Balmedie OP3: Hard and soft landscaping schemes and a compensatory planting scheme. 	<p>Through the development management and EIA process.</p> <p>Landscape strategies and masterplanning of sites.</p>

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
			<ul style="list-style-type: none"> • Pitmedden and Milldale OP1: Focus landscaping and open space towards the south, adjacent to Bronie Burn. • Banchory OP2: Suitable landscaping and planting throughout the site. <p>Where the assessment has identified an area of a site that is more visually prominent on the landscape, these areas will need to be developed sensitively and will require strategic landscaping, as identified in the Settlement Statements. In some cases, the undeveloped coastal zone has been used to ensure development does not take place in these areas.</p> <p>In view of the potential likely significant negative impacts arising from the implementation of the LDP, an EIA will be submitted before relevant developments (e.g. renewables) can commence. Landscape strategies may be required.</p>	
Material assets	Lack of adequate infrastructure to accommodate the scale of housing proposed and potential for new development to demand mineral resources and different types of infrastructure (e.g. water	Yes	The LDP contained a variety of policies that are designed to have a positive impact on development and mitigate any adverse effects. Similarly, the Settlement Statements also include	Through the development management and Planning Agreements processes.

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
	<p>transport, social, energy). Allocations Ellon OP2 and Portlethen OP1 could have a negative impact on material assets.</p> <p>The need to increase reuse and recycling of resources.</p> <p>The need to prioritise development on vacant brown field sites.</p> <p>Lack of planned green networks within and connecting settlements.</p> <p>Policy H1 Housing Land, Policy H2 Affordable Housing and Policy H3 Special Needs Housing could have significant negative effects on material assets, as development may be insufficient to justify a sufficient developer obligation to resolve deficits in the material assets within a settlement.</p>		<p>mitigation measures for the settlement and specific sites, where appropriate.</p> <p>Adoption of circular economy principles, to increase reuse and recycling of resources, are supported by policy PR3 Reuse, Recycling and Waste.</p> <p>Further opportunities for brownfield redevelopment will continue to be identified, which will provide opportunities to remediate contaminated land.</p> <p>Green-blue networks have been identified within settlements, although generally this is associated with open space. Better integration of the green-blue network may be required in the future.</p> <p>Development that cannot be served by adequate infrastructure, either through developer obligations or additional external public funding, will not be permitted.</p>	When preparing masterplans.
Population	The LDP makes housing land allocations taking population change, house type, tenure, specific needs and affordable housing into consideration.	Yes	Policies on housing are intended to meet the housing needs of the area. A generous supply of housing is maintained in both market areas.	Through the development management and Planning Agreement processes.

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
	An increasing population and a growing elderly population places great and wide ranging demands on housing.		The LDP also provides further detail on the layout siting and design of new development in appendices 8 and 9 for large and small-scale developments.	When preparing masterplans. Planning Agreements.
Human health	<p>The loss of open space for other community uses (e.g. a health centre in Banchory) should be compensated elsewhere through new development.</p> <p>Supporting the provision of employment land and new housing in the regeneration priority areas has the potential to have positive impacts on human health.</p>	Yes	<p>Existing areas of public open space are protected under policies PR1 Protecting importance resources and P2 Open space and access in new development, with this policy also referring to the creation of new areas of open space as part of a development proposal.</p> <p>The LDP also supports opportunities for new business and employment proposals in the regeneration areas.</p>	<p>Through the development management and Planning Agreement processes.</p> <p>When preparing masterplans.</p>
Cultural heritage	<p>Potential for development to impact on listed buildings, archaeological sites and battlefields, historic gardens and designed landscape.</p> <p>Vulnerability of historic and cultural heritage assets to insensitive developments.</p> <p>Potential loss of heritage resources of regional and national significance.</p>	Yes	The LDP contains policies and actions in Appendix 7a to 7f (Settlement Statements) to protect and enhance the historical environment. It manages the conflict between modern requirements and historic buildings and sites. A robust process of design encourages good design quality.	<p>Through the development management process.</p> <p>When preparing masterplans.</p>

SEA Topic	Findings from the environmental report	Integrated into Plan (Yes/No)	How Integrated/Taken into Account or Reason for not Being Taken Into Account	When should mitigation be considered?
	<p>High number of buildings on at risk.</p> <p>Only Longside Airfield site OP1 was identified as having possible significant negative effects on this former World War Two airfield, which is partially still in use.</p> <p>Policy C2 Renewable Energy could have significant negative effects on cultural heritage from renewable energy installations.</p>			

6. Taking Consultation Opinions into Account

6.1 As required by Section 18 (3) (c) and (d) of the Environmental Assessment (Scotland) Act 2005, the opinion expressed during the consultation were given due consideration. **Tables 4 and 5** summarise the opinions expressed during the consultation of the Interim Environmental Report, which was published alongside the Main Issue Report in 2019, and Environmental Report, which was published alongside the Proposed LDP in 2020, and how they were considered.

6.2 These tables include all the changes identified following the public consultations.

Extracts from the Interim Environmental Report (2019) and The Environmental Report (2020), as amended:

Table 4: Analysis of Comments from the Consultation Authorities and the Public on the Interim Environmental Report 2019 for the Main Issues Report 2019.

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Scottish Environment Protection Agency	General comments	The Environmental Report (ER) provides a good summary of the process, and acknowledges and applies the many of the comments and recommendations outlined in the scoping response to the ER. Are satisfied that most of their scoping report comments have been taken into account.	Noted. No action required.	
Scottish Environment Protection Agency	General comments	Welcomes the summary of consultee comments and how they have been taken on board in Appendix 8.1– Analysis of Consultations.	Noted. No action required.	Appendix 8.1
Scottish Environment Protection Agency	General comments	The next ER should be updated to include the mitigation measures identified through the Main Issues Report (MIR) consultation process on the polices and sites.	Agreed. Preferred sites have been prioritised.	Section 6.6, Appendix 8.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Historic Environment Scotland	General comments	Welcome acknowledgement of rich cultural heritage of the area, impact it has in shaping its current degree/form, and mitigation measures set out (and their appropriateness).	Noted. No action required.	
Historic Environment Scotland	General comments	No methodology set out at the opening of the assessment. Hard to assess if conclusions are justified/ reasonable. Summary of approach taken would be helpful to those not familiar with SEA process. Methodology noted to be in the full Scoping Report, but this is not on the website.	The Scoping Report will be published online, along with the Environmental Report (ER). A summary has been provided at the start.	Section 6.1
Scottish Natural Heritage	Non-Technical Summary	Support the Non-Technical Summary statement that one of the baseline problems is "Pressure on potable water supplies and sources from the River Dee."	Noted. No action required.	Section 1.4
Scottish Natural Heritage	Non-Technical Summary	Recommend the addition of key issues of fragmentation/ lack of green networks, habitat connectivity, and lack of active travel opportunities.	Agreed. These issues will be added to section 1.4.	Section 1.4.
Scottish Natural Heritage	Non-Technical Summary	Suggests the assessment of effects (Table 1.1) could be better focussed in highlighting the 'significant' environmental issues (e.g. Table 1.1 has a limited section on 'Landscape', which is focussed on visual effects, architecture and brownfield sites, and presents an incomplete picture of the main issues affecting Aberdeenshire landscape).	Agreed. All significant effects from the assessments of the Proposed Plan have been added to an amend Table 1.1 accordingly.	Table 1.1
Scottish Environment Protection Agency	Relationship with other Plans, Policies and Strategies (PPS)	Considers all the PPS relevant to their interest, as listed in Appendix 8.2, have been considered in the ER.	Noted. No action required.	Table 5.1 and Appendix 8.2

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Historic Environment Scotland	Relationship with other Plans, Policies and Strategies (PPS)	Table 5.1 should refer to the new suite of policies and guidance from Historic Environment Scotland (Historic environment Policy for Scotland, Designations Policy and Selections Guidance, Scheduled Monuments Consent Policy, Demolition of Listed Buildings and Use and adaptation of Listed Buildings).	Agreed. Table 5.1 has been updated with the new suite of policies and guidance from Historic Environment Scotland.	Table 5.1 and Appendix 8.2
Scottish Natural Heritage	Significant baseline changes since the ALDP 2012	Supports this section.	Noted. No action required.	Section 2.2
Scottish Natural Heritage	Significant baseline changes since the ALDP 2012	The increase in abstraction pressure physically occurring on the River Dee SAC should be added as a key change.	Agreed. A new paragraph has been added to section 2.2, "There has been an increase in abstraction pressure physically occurring on the River Dee Special Conservation Area."	Section 2.2
Scottish Natural Heritage	Significant baseline changes since the ALDP 2012	Welcomes Table 2.2 (pg. 14): Review of Mitigation Measures in the ALDP 2017 Post Adoption Statement.	Noted. No action required.	Section 2.1, Table 2.2
Scottish Natural Heritage	Significant baseline changes since the ALDP 2012	Welcomes the reference to the River Dee SAC under "Water", but expects to see specific mitigation measures, for example a high standard of water efficiency measures.	Noted. As new developments are expected to meet the six qualities of successful places under Policy P1 (Layout, siting and design), new text will be added to Table 2.2 under "Water" - "The ALDP requires new	Section 2.1, Table 2.2

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			developments to meet the six qualities of successful places, which includes proposals being resource efficient (e.g. in their use of water)."	
Scottish Natural Heritage	Environmental protection objectives	Welcomes the addition of invasive non-native species under 'Biodiversity, flora and fauna', and green networks and active travel routes under 'Human health'.	Noted. No action required.	Section 5.4, Table 5.3
Scottish Natural Heritage	Environmental Baseline data	Amend Appendix 8.3.2 (SEAP Topic - Water) to state that under 'Qualified information', freshwater pearl muscles are now "Unfavourable change no change to declining" and under 'Issues', freshwater pearl muscles are "unfavourable".	Agreed. Appendix 8.3.2. has been amended.	Appendix 8.3.2
Scottish Natural Heritage	Environmental Baseline data	In the SEA Scoping Report, SNH suggested that under "Soils", Appendix 7.2.4 (Carbon rich soils, deep peat and priority peatland), use the 'carbon rich soil, deep peat and priority peatland habitats 2016' dataset combined digital soil information, and the % and type of carbon rich soils is provided at: https://www.nature.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers/planning-and-development-soils/carbon-and-peatland-2016	This dataset was used in the assessment of the Main Issues Report bid sites. Appendix 8.3.4 has been amended.	Appendix 8.3.4
Scottish Natural Heritage	Environmental Baseline data	Under "Human Health", welcomes the inclusion of baseline information on green networks.	Noted. No action required.	Appendix 8.3.9
Scottish Environment	Environmental Baseline data	Notes and welcomes that a Strategic Flood Risk Assessment (SFRA) has been carried out at this stage and	Mitigation measures identified as part of SEPA's	Appendix 8.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Protection Agency		are satisfied that this has adequately informed the site assessment process. Comments on specific site flood risk assessment on MIR should be taken forward to the next ER report.	response on the MIR has been reviewed, and Appendix 8.5 the ER amended accordingly.	
Scottish Environment Protection Agency	Environmental Baseline data	Recommends the spatial strategy going forward should be informed by the SPACE tool (Scottish Government's Spatial Planning Assessment for Climate Emissions).	Noted. Launched in late 2018, this is a tool that will be considered in the future. It is currently not mandatory, and mitigation measures will help reduce impacts.	
Scottish Environment Protection Agency	Environmental problems	Are generally satisfied with the section on environmental problems and the Main Issues identified in the MIR.	Noted. No action required.	Section 5.4
Scottish Environment Protection Agency	Environmental problems - water	Include the following environmental problem in Table 5.3: <ul style="list-style-type: none"> the proliferation of private septic tanks and discharges to the water environment in smaller settlements and rural areas that lack a public waste water drainage network, which leads to pollution of water. The role of Plan is to locate development where it is possible to connect to the public sewer network. 	Agreed.	Section 5.4, Table 5.3
Scottish Environment Protection Agency	Environmental problems - water	Include the following environmental problem in Table 5.3: <ul style="list-style-type: none"> run off from construction sites when soil stripping has taken place, particularly when this is undertaken all at one time rather than in phases. The role of the Plan is to ensure there are policies in place for developer requirements regarding the submission of Construction Environment Management Plans (CEMPs). SEPA also has a role on larger 	It is not considered necessary to add this, as the ALDP does not list all assessments that are required, which should be identified as part of the	Section 5.4, Table 5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		development sites through our Construction Site Licencing role.	planning application processes.	
Scottish Natural Heritage	General difficulties, weakness and limitations	This section is helpful in explaining any issues and limitations with the assessment. SNH note the Aberdeenshire LDP 2017 sites that are being carried forward are included in the bids summary table, but time did not allow the updating their scores to include the mitigation measures, unlike the bids. Welcome the full inclusion of all individual bid assessments that present a clear audit trail for the reader.	Noted. Existing allocation that are to be carried forward have already gone through the LDP and SEA process (some twice). Their scores in the summary tables have been updated to include mitigation measures.	Section 6.2 and Appendix 8.5 (summaries of allocations and bids assessment)
Scottish Natural Heritage	General difficulties, weakness and limitations	Agree with the difficulty of consistency and provided an example below of discrepancies of scoring Biodiversity impacts and post mitigation (e.g. site FR002 scored '-' and FR033 scored '+' are on agricultural land, but have different scores and mitigation measures). SNH would be pleased to discuss how this risk could be limited in future.	Upon reviewing these two examples, site FR002 is on prime agricultural land (PAL), and this was incorrectly considered under the Biodiversity SEA Topic. While species within the soil could be affected, PAL should only be considered under the Soil SEA Topic. The methodology for assessing sites was agreed in the Scoping Report, but is open to interpretation by different assessors. This risk can be reduced by a single officer undertaking a consistency check.	Appendix 8.5 (summaries of allocations and bids assessment)

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Scottish Natural Heritage	Identifying significant negative effects	Table 6.1 (lists sites and policies with significant negative effects) is a useful summary table in principle, but identifies inconsistencies between the sites included, the MIR and their own conclusions. Recommend that it is checked and revised for inclusion in the final ER, and that it is consistent with the draft Habitats Regulations Assessment (HRA).	Table 6.1 has been amended upon review of the MIR and HRA comments.	Section 6.3, Table 6.1
Scottish Natural Heritage	Cumulative impacts	Welcomes the consideration of cumulative effects of the plan on the environment, and in particular consideration of cumulative effects of development on the River Dee SAC. Highlights para 5.19 PAN 1/2010, which lists possible cumulative effects from the spatial strategy and LDP policies.	Noted. However, the Proposed ALDP carries forward the spatial strategy and policies from the last two ALDPs with moderate changes, and the likely impacts have been assessed.	Section 6.4 and Appendix 8.6
Scottish Natural Heritage	Cumulative impacts	Last para "Sites that would result in the loss of trees has been kept to a minimum, in line with national policy. Not all bid sites could provide compensatory planting.", is not clear whether these bid sites were discounted or proposed for inclusion in the Plan.	Agree. Added at the end of the last sentence, "...for the loss of trees, and as such were not included in the ALDP."	Section 6.4
Scottish Natural Heritage	Habitats Regulations Appraisal	The link to the HRA is welcome. The final ER should be consistent with the draft HRA once revised (River Dee abstraction) and be updated to reflect the outcome of the HRA process.	Agree. No issues were raised in the HRA that require additional mitigation measures to be identified in the site assessments.	Section 6.5 and Appendix 8.5
Scottish Natural Heritage	Habitats Regulations Appraisal	Provide a full explanation of the approaches and links between the SEA and HRA processes.	A new paragraph has been added to section 6.5, noting that the site assessments will consider the outcomes and comments on the draft HRA. The relevant site	Section 6.5 and Appendix 8.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			assessments will also be updated.	
Scottish Natural Heritage	Habitats Regulations Appraisal	Appendix 7.3 Table 1: conclusion and recommendation: "HRA screened in" section – i.e. does the HRA screen the site in for likely significant effects on a European site? Delete "Site is located within a SPA" and amend to: "YES or NO".	Unable to answer as it is not clear which document is being referred to. Appendix 7.3 does not exist in the ER or draft HRA.	
Scottish Natural Heritage	Mitigation	The Environmental Report should identify the changes made to the plan as a result of the SEA. For site assessments, encourage identification of how the mitigation proposed is being effected e.g. decision not to proceed with the site, amendment of site boundaries or developer requirements.	Noted. The SEA has not affected the proposed ALDP's vision, spatial strategy or much of its policies, as this Proposed Plan carries forward the previous two Plans. However, a new paragraph has been added to Section 6.6 highlighting where the SEA has influenced the Plan.	Section 6.6
Scottish Natural Heritage	Mitigation	Column "when should mitigation be considered": Add 'Include as part of the LDP development site requirements.'	Agree, but amended to "Included as part of the allocation summary for relevant sites in the Proposed ALDP." under the relevant SEA Topics.	Section 6.6, Table 6.2
Scottish Natural Heritage	Mitigation	Specific mitigation and monitoring for the River Dee SAC: This should be consistent with the Environmental Report for the Aberdeen City and Shire Strategic Development Plan (SDP) and accompanying HRA once finalised.	Agreed. The Monitoring Table 6.3 has been updated to be consistent with the SDP's ER (Table 6.2) and the HRA.	Section 6.7, Table 6.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Scottish Environment Protection Agency	Mitigation	Welcomes the proposed mitigation framework set out in Table 6.2.	Noted. No action required.	Section 6.6, Table 6.2
Scottish Environment Protection Agency	Mitigation	Notes Masterplanning has been identified as a mitigation measure, but is only identified in Table 6.2 as a measure for SEA topics biodiversity, material assets, human health, and cultural heritage. It should be included in all SEA topics in Table 6.2 and acknowledged on page 6.	It is accepted that masterplanning could help with all these SEA Topics. Table 6.2 has been amended to highlight Masterplanning can assist for some sites on these additional SEA Topics.	Sections 1.6 and 6.6, Table 6.2
Scottish Environment Protection Agency	Mitigation	Suggest the term "Statutory consultees" is used in the last column. SEPA, as a "Statutory Consultee", wish to be identified as responsible for mitigation in relation to Water (though the Masterplanning process, and their flood advisory, RBMP regulatory roles), Climatic Factors (flood advisory role, peat management and Zero waste), Soil, and Material Assets.	Agreed. Changes made.	Section 6.6, Table 6.2
Scottish Environment Protection Agency	Mitigation	Note Developers are responsible for Human Health, Cultural Heritage, Soil but not others. Suggests they are identified as responsible for all SEA topics.	Agreed. Changes made.	Section 6.6, Table 6.2
Scottish Environment Protection Agency	Mitigation	In relation to the possible mitigation measures relating to the Water SEA topic, wish to see in the bullet point relating to Settlement Statements, a requirement to investigate and implement enhancements to the water environment.	Agreed. This was added to the ER.	Section 6.6, Table 6.2

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Scottish Environment Protection Agency	Mitigation	In relation to the possible mitigation measures relating to the Material Assets SEA topic, wish to see a requirement with regards co-location issues to protect existing operations/land uses.	Agreed. This was added to the ER.	Section 6.6, Table 6.2
Scottish Environment Protection Agency	Mitigation	In relation to the possible mitigation measures relating to the Material Assets SEA topic, the use of flood resistant building measures could be included here.	Agreed. This was added to the ER.	Section 6.6, Table 6.2
Historic Environment Scotland	Mitigation	Welcome identification of HES in agreeing mitigation, but recommend including local archaeological and conservation services.	Agreed. This was added to the ER.	Section 6.6, Table 6.2
Scottish Environment Protection Agency	Findings of the Assessment Undertaken	We note the mitigation measures proposed for sites within Appendix 8.5 Preferred and Alternative Site Assessments.	Noted. No action required.	Appendix 8.5
Scottish Environment Protection Agency	Findings of the Assessment Undertaken	It is useful to show the link between potential effects and proposed mitigation/ enhancement measures in the assessment framework [in Appendix 8.5].	While the comments column could be reviewed to better identify negative impacts pre-mitigation, e.g. "Site has an overall mixed/ positive/ negative impact. Negative impact on climate change can be mitigated against by a Flood Risk Assessment." To keep the ER short, only the post-mitigation scores are shown	Appendix 8.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Scottish Natural Heritage	Monitoring	Support continuation of monitoring from the adopted plan's SEA for this SEA for consistency.	Noted. No action required.	Table 6.3
Scottish Natural Heritage	Monitoring	Support the inclusion of monitoring of abstraction in the River Dee SAC and recommend reference to the Strategic Development Plan Authority's (SDPA) co-ordinatory role on these issues (Aberdeen city and shire SDP SEA ER).	Agreed. Reference to SDP will be added to the ER.	Table 6.3
Scottish Environment Protection Agency	Monitoring	Welcome the monitoring proposals as outlined and think these are a reasonable and realistic set of proposals.	Noted. No action required.	Table 6.3
Scottish Environment Protection Agency	Monitoring	Another possible indicator under biodiversity could be percentage loss of wetlands.	This may not be possible without a baseline that is monitored. Departures from Policy C3 Carbon sinks and stores are already proposed to be monitored in Table 6.3.	Section 6.7, Table 6.3
Historic Environment Scotland	Monitoring	Monitoring measures at Table 6.3 should be broadened. Concerns over using numbers of buildings at risk as an indicator, as a reduction may reflect demolition as well as active reuse. Would welcome a more qualitative approach considering where cultural heritage has influenced design/outcomes and decisions where policies have been referred to as determining factors. May be helpful to look at categories of listed building consent cases (demolition or buildings at risk) and enabling development cases.	Agreed. Comparisons have been made with the SDP SSEA and Aberdeen City's MIR SEA.	Table 6.3
Scottish Environment	Next Steps	Considering the size and number of sites anticipated to be contained within the Proposed Plan and that the	The ER consultation will run after the Proposed LDP has	

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Protection Agency		consultation period could be over Christmas, request extending of the consultation period of the ER from 6 to 12 weeks.	been agreed by Aberdeenshire Council, which will be after Christmas and for a period of 8 weeks.	
Historic Environment Scotland	Spatial strategy	Paragraph 8.4.2 states there will be a positive impact on cultural heritage from the spatial strategy, but later says there will be no impact. This should be clarified.	Noted. On cultural heritage, "no impact" has been changed to "a positive impact"	Section 8.4.2, Table 8.4.2
Scottish Natural Heritage	Policy Assessment	Expects the final ER will assess the policies included in the Proposed Plan.	All the policies in the Proposed Plan have been assessed.	Section 8.4.3
Scottish Natural Heritage	Policy Assessment	Welcomes Tables 4.2/4, which provide a summary of the key changes proposed, and Appendices 8.4/5, which contain the detailed assessment of the Vision, spatial strategy and policies.	Noted. No action required.	Sections 4.3 to 4.5
Scottish Natural Heritage	Policy Assessment – Policies B1, B3 and H1	In some cases, the potential for significant environmental effects from the LDP's policies have been under-recorded. States policies B1 and H1 should score negative on biodiversity than positive as no mitigation measures are proposed; and policy B3 - the policy assessment should reflect the uncertainty of impacts as tourist developments are unknown, and the alternative option 1 may impact upon biodiversity is not reflected in the scoring or mitigation.	Disagree as policies B1 and H1 refer to allocated sites or existing employment sites that avoid sensitive sites. Scores for Policy B3 on biodiversity have been updated, but disagree that there is uncertainty on assessing tourist proposals.	Section 8.4.3, Tables 8.4.3, 8.4.5 and 8.4.14
Historic Environment Scotland	Policy Assessment – Policies R1 and R2	On Cultural Heritage, it is not clear what is intended by the negative impact, as vernacular buildings may or may not be designated as listed buildings. Possible that this policy will not have a significant effect on cultural heritage if	Agreed. Impact changed to neutral.	Section 8.4.3, Table 8.4.9

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		proposals are in line with historic environment policies. Would welcome further clarity in the assessment.		
Historic Environment Scotland	Policy Assessment – Policies H1, H2 and H3	On Cultural Heritage they score negative, but there is the potential for both positive and negative effects (e.g. does not encourage reuse of historic buildings, but it avoids setting impacts). Possible that this policy will not have a significant effect on cultural heritage if proposals are in line with historic environment policies. Would welcome further clarity in the assessment.	Agreed. Impact changed to mixed for these policies.	Section 8.4.3, Tables 8.4.14, 8.4.15, 8.4.16 and 8.4.17
Historic Environment Scotland	Policy Assessment – Policy H5	On Cultural Heritage, welcome the consideration of impacts on intangible, non-physical elements of cultural heritage (i.e. positive effects on the culture of gypsies and travellers). This should be reflected in the methodology when published.	Noted, but it is not necessary to amend the methodology for assessing the ALDP.	Section 8.4.3, Table 8.4.19
Historic Environment Scotland	Policy Assessment – Policy P1	On Cultural Heritage, would welcome opportunity to input on the design appendix guidance to ensure it forms robust mitigation for cultural heritage interests.	The design appendix will be very short and is being developed internally. However, it is published as part of the Plan and is open to formal representations.	Section 8.4.3, Table 8.4.20
Historic Environment Scotland	Policy Assessment – Policy P3	On Cultural Heritage, agree with negative effects. Further mitigating factors include historic environment policies particularly for when alterations, extensions or demolition of historic assets or impact on setting are being considered.	As reference is made to Policy P1 on design, it is considered appropriate to add to the ER, "The historic environment policies would also apply, where relevant."	Section 8.4.3, Table 8.4.22

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Historic Environment Scotland	Policy Assessment – Policies HE1, HE2 and HE3	On Cultural Heritage, likely to be more significant positive effects, if suggested changes are made to the policies (e.g. setting on scheduled monuments, landscape within battlefields, vernacular buildings and demolition of listed buildings).	Agreed. Change impact to significantly positive for policies HE2 and HE3 (policy HE1 already has this score).	Section 8.4.3, Tables 8.4.31, 8.4.32 and 8.4.33
Historic Environment Scotland	Policy Assessment – Policy PR2	On Cultural Heritage, agree there is potential for negative effects. Potential mitigation includes consideration of historic environment in design, where possible.	Agreed. ““Consideration of historic environment during the design stage would be undertaken.” added to Mitigation measure’ column,	Section 8.4.3, Table 8.4.36
Historic Environment Scotland	Policy Assessment – Policy C2	On cultural Heritage, agree potential for adverse impacts as the wording currently stands.	Noted. No action required.	Section 8.4.3, Table 8.4.39
Scottish Natural Heritage	Site Assessments - general	Some examples of inconsistencies, under recording of significant effects, assessment and mitigation is too generic. Need for accuracy and consistency.	The assessments of the bid sites have been reviewed for consistency.	Appendix 8.5
Scottish Natural Heritage	Site Assessments - general	Findings of the SEA are used in the Proposed Plan's site development requirements [in the Settlement Statements].	Noted. Mitigation measures identified in the ER will be added to the Proposed Plan, although most of these have been picked up from SNH's comments on the Main Issues Report.	Appendix 8.5
Scottish Natural Heritage	Site Assessments - general	Welcomes the links to the full assessment of each site bid assessment and the inclusion of existing sites carried forward (pg. 52). Also support the scoring symbols used.	Noted. No action required.	Appendix 8.5, pg. 256

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Scottish Natural Heritage	Site Assessments - general	The site assessment process could be improved to become more useful, effective and accurate. The current approach lacks meaningful conclusions with some inconsistencies and omissions, both in the SEA and in relation to the MIR and HRA evaluations. SNH have reviewed Buchan and Formartine sites (see below), and recommends the site assessments for the other areas are checked.	The assessments of the bid sites will have been reviewed for consistency. The 'Mitigation measure' column in Appendix 8.5 has been amended to be clearer and show which SEA Topic is being mitigated against.	Appendix 8.5
Historic Environment Scotland	Site Assessments - general	Level of detail provided for historic environment assessment is very variable with some instances of potentially significant impacts where no commentary has been given. Recommend that the assessments are reviewed.	The assessments of the bid sites have been reviewed for consistency.	Appendix 8.5
Scottish Environment Protection agency	Site Assessments - general	Strongly recommends existing allocations (OP sites) are reassessed and mitigation measures identified. Issues such as flooding (and need for a FRA), better baseline data, or co-location issues from a quarry or distillery may have arisen since the last Plan.	Agreed. The existing OP sites have been reviewed as part of the SEA of the Proposed Plan, along with a clearer mitigation measures column.	Appendix 8.5
Scottish Environment Protection agency	Site Assessments - general	Requests developer requirements identified for existing sites with a bid in the MIR are added to the Plan to reflect any changes in information.	Agreed. The existing OP sites have been reviewed as part of the SEA of the Proposed Plan.	Appendix 8.5
Scottish Environment Protection agency	Site Assessments - general	All sites that could have a possible new built element should be assessed/reassessed, including Protected Land.	Noted. All existing business land, protected land, and reserved sites are already part of the SEA.	Appendix 8.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Inverurie Community Council	Site Assessments - general	The Environmental Assessment and mitigation documents appear to be unfinished, rather vague and will require quite a bit more work in terms of definition, detail and practical implementation proposals.	Noted. The bids in the ER are vague, but the full assessment is each bid is provided as a supporting document.	Appendix 8.5
Scottish Natural Heritage	Site Assessment - scoring	Notes many proposals score positive or neutral as they could provide opportunities for enhancement. This places a high degree of confidence in achieving these mitigation measures, without which the development may have adverse effects (e.g. KN034, KN059 and KN134). Recommends the SEA mitigation for the Biodiversity Topic is transferred in the LDP site requirements where appropriate to help ensure its implementation.	Agreed, although SNH have identified mitigation measures for proposals in the MIR, which have been accepted.	Appendix 8.5
Scottish Natural Heritage	Site Assessment - scoring	Suggests the effectiveness of the mitigation is monitored and that this informs the next SEA process.	Agreed where it is possible to monitor the policies associated with the relevant mitigation measures.	Section 6.7
Don District Salmon Fishery Board	Site Assessment – Bids within River Don catchment [Garioch]	Within the SEA for the Don catchment, it has been recorded that the Water Treatment Works (WTW) capacity is unknown for several of the preferred sites. Furthermore, most of the preferred developments will require an upgrade to an adoptable standard of WTW. It is also acknowledged that these developments will result in localised impacts on watercourses during the development phase of the sites i.e. change in water table, stream flows, site water budgets, silt deposition and water-borne pollution. Its suggested that the impact is likely to be short term, however the Council should ensure that any development, no matter the scale be fully risk assessed	No action required. Water abstraction is a matter for Scottish Water, but new developments are expected to apply water efficiency measures, as part of Policy P1, Layout, siting and design. Pollution issues during construction are considered at the planning application stage.	Appendix 8.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		and appropriate mitigation put in place before, during and post development.		
Scottish Natural Heritage	Site Assessment - scoring	Notes that soil will be most affected due to the loss of prime agricultural land, but many assessments suggest developments will have neutral effects on soils or short-term impacts (KN109). These would be long term and largely irreversible. The majority of developments will result in the sealing and effective long term, irreversible loss of soils.	Disagree. While there will be soil sealing, developments can be demolished and land returned to nature, as has occurred throughout history. We maintain that soil sealing is an issue where it would result in the loss of prime agricultural land, as set out in our Scoping Report.	Full assessments and Appendix 8.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment - scoring	On soil, queries the application of scoring and consistency of approach to sites affecting prime agricultural land, given that sites identified and allocated are on PAL (e.g. in Kincardine and Mearns). Concerned how officials differentiate between [bid] sites given there is effectively no choice if allocations are to be taken forward.	No action required. A standard on assessing impacts on soil was agreed in the SEA Scoping Report and applied to all bids. We agree that a site on prime agricultural land could be appropriate on consideration of all issues and opportunities affecting the site.	Appendix 8.5
Scottish Natural Heritage	Site Assessment - scoring	On climate change, the neutral conclusions in many cases seem unfounded when they will undoubtedly result in increased car use in most cases. Suggests this is considered as a cumulative issue.	Noted, but this issue is already identified in the ER, in section 6.4 and Appendix 8.6 Cumulative Effect Assessment.	Section 6.4 and Appendix 8.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Scottish Natural Heritage	Site Assessment - scoring	On Landscape, SNH disagree with the assessment statements that what gets developed becomes part of the landscape. This is contrary to Guidelines for Landscape and Visual Impact Assessment (GLVIA). For example, extract from BUS1/FR094/FR095 at Pitmedden; the first bullet states long term negative impact, but the second states these are reduced to medium term.	Disagree. Bids FR094 and FR095 are for different uses on the same site and score differently. Also, the first bullet point in the example applies to the landscape impact, whereas the second bullet point refers to the visual impact and receptors tolerance to change.	
Scottish Environment Protection agency	Site Assessments – ALDP sites carried forward	As these sites have not been assessed through the SEA process for a number of years, they will need to be re-screened for flood risk, any new co-location issues etc. SEPA request the [GIS] shape files for all sites to be taken forward in the Draft Proposed plan	The existing OP sites have been reviewed as part of the SEA of the Proposed Plan, but only their summary is provided. Shape files for all sites in the Proposed Plan can be provided.	
Historic Environment Scotland	Site Assessment - Bid BB016	At Ladysbridge, agree with SEA on potential to have uncertain or adverse impact on cultural heritage.	Noted. No action required.	
Historic Environment Scotland	Site Assessment - Bid BB021	Agree with SEA on potential to have significant adverse impact on cultural heritage.	Noted. No action required.	
Historic Environment Scotland	Site Assessment - Bid BB025	At Ladysbridge, agree with SEA on potential to have uncertain or adverse impact on cultural heritage.	Noted. No action required.	

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Historic Environment Scotland	Site Assessment - Bid BB026	Agree with SEA on potential to have uncertain or adverse impact on cultural heritage.	Noted. No action required.	
Halliday Fraser Munro on behalf of Seafield & Strathspey Estates	Site Assessment - Bid BB028	The SEA of BB028 is overly negative. A revised SEA assessment by the respondent suggests a slightly positive impact. A full review and summary SEA for the site is provided as part of the representation.	Disagree. The flooding issue outwith this site has been ongoing for several years and remains unresolved. This has resulted in the Housing Land Audit marking the site as 'physically' constrained. No technical solution to the flood risk has been put forward.	
Historic Environment Scotland	Site Assessment - Bid BB034	On, Cultural heritage, at this stage the level of impact on setting of the monument Scheduled monument SM5810 (St Ethernan's, Rathen old parish church) is uncertain.	Accepted. Summary and full assessments amended.	Appendix 8.5.1
Historic Environment Scotland	Site Assessment - Bid BU004	On Cultural heritage, agree with assessment.	Noted. No action required.	Appendix 8.5.2
Scottish Natural Heritage	Site Assessment - Bid BU005b	No reference to woodland included in the Scottish semi-natural woodland inventory bordering this site on its west and south sites.	Noted. This has been added to the Environmental Report and the full assessment has been updated. Effects could be mitigated by a buffer strip.	Appendix 8.5.2
Scottish Natural Heritage	Site Assessment - Bid BU005b	The SEA does not refer to nor differentiate between BU005a (preferred) and BU005b.	Noted. Two separate assessments were	Appendix 8.5.2

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			undertaken for sites BU005a and BU005b.	
Scottish Natural Heritage	Site Assessment - Bid BU019	Northern part of site in Auchleuchries is within an area of carbon rich soil and peatland, which extends north around Moss of Muirtack. Development of this area could affect peatland soils on and to the north of the proposed site.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.2
Historic Environment Scotland	Site Assessment - Bid BU025	On cultural heritage, there is potential for an adverse impact (scheduled monuments).	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.2
Scottish Natural Heritage	Site Assessment - Bid BU026	The SEA for this future reserved site in Fetterangus states that there would be a loss of trees and hedges and no mitigation measures are proposed. The SEA should note the presence of tree bands on the north and southern edges of this preferred bid, which are included in the Scottish semi-natural woodland survey. Provide mitigation to protect/enhance.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.2
Historic Environment Scotland	Site Assessment - Bid BU026	On cultural heritage, there is potential for an adverse impact (scheduled monuments).	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.2
Scottish Natural Heritage	Site Assessment - Bid BU031	The landscape assessment for this non-preferred bid site in Boddam should be '- ', as the site is physically and visually divorced from Boddam, and only the north corner bears some relation to the small settlement at Stirling. If taken forward much of the site should remain undeveloped to	The Environmental Report and the full assessment have been updated to	Appendix 8.5.2

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		avoid significant landscape and visual effects, with some development adjacent to Stirling to consolidate this settlement.	reflect the issue raised (and any mitigation measures).	
Scottish Natural Heritage	Site Assessment - Bid BU034	Omits reference to site in New Pitsligo including woodland listed in the Ancient Woodland Inventory (AWI) and the Scottish semi-natural woodland inventory. The SEA states native tree planting would partially mitigate the loss of woodland, but it may not be possible to alleviate the loss of TPOs. Mitigation should include retention and enhancement of woodland of value.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.2
Scottish Natural Heritage	Site Assessment - Bid BU044	Badgers and field woundwort are not European Protected Species https://www.nature.scot/professional-advice/safeguarding-protected-areas-and-species/protected-species/legal-framework/habitats-directive-and-habitats-regulations/european	The Environmental Report has been corrected.	Appendix 8.5.2
Scottish Natural Heritage	Site Assessment - Bid BU058	The SEA for this non-preferred bid in Crimond should note that the adjacent woodland is in the Ancient Woodland Inventory (AWI).	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.2
Scottish Natural Heritage	Site Assessment - Bid BU058	The south eastern part of the site is carbon rich soil and consequently could raise climate change issues.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.2
Scottish Natural Heritage	Site Assessment - Bid BU059 and BU060	The SEA omits that part of site BU059 in St Fergus and all of BU060 are within an area of carbon rich soil and peatland and this should be included in the SEA.	The Environmental Report and the full assessment have been updated to	Appendix 8.5.2

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			reflect the issue raised (and any mitigation measures).	
Scottish Natural Heritage	Site Assessment - Bid BU064	NW corner of site in Maud is adjacent to woodland in the Scottish semi-natural woodland inventory and there are bands of trees to the west and south of the site. These are not recognised in the SEA. Note proposal is scored as '+' for biodiversity, before and after mitigation.	The Environmental Report and the full assessment have been updated. Effects could be mitigated by a buffer strip. Pre-mitigation biodiversity score will be '-'.	Appendix 8.5.2
Historic Environment Scotland	Site Assessment - Bid FR006	On cultural heritage, there is potential for an adverse impact (A listed Udney Castle).	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment - Bid FR014	SEA doesn't note adjacent ancient woodland although the MIR does	The Environmental Report and the full assessment have been updated. Effects could be mitigated by a buffer strip.	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bid FR022	On cultural heritage, there is potential for an adverse impact on Scheduled monument SM3275 (The Temple Stones, stone circle NE of Potterton House).	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bids FR022 and FR116	Understatement of impacts for FR116 and overstatement for FR022. FR116 is within the coastal protection zone and FR022 is not protected by this designation. There is a presumption against residential development in the open	No action required. Both sites would lead to development in the countryside. Coalescence from FR116 is not considered an issue at this time. Sites	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		countryside and development that might lead to coalescence.	can be allocated in the Coastal Zone if they are a logical location for development within minimal issues, and can be delivered.	
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bid FR022	On water, FR022 scored '-' when FR116 scored '0', but FR022 has access to trunk sewer (Belhelvie to Balmedie WWTP) and new trunk water main within the site. FR116 has neither advantage.	No action required. FR116 pre-mitigation score should be '--' for Water. FR022 score remains as is, as it could affect a watercourse where the quality of water is poor.	Appendix 8.5.3
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bid FR022	Water course is outwith the development area in the draft masterplan for FR022.	No action required. The ER already acknowledges this.	Appendix 8.5.3
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bids FR022 and FR116	On biodiversity, FR022 scored '-' when FR116 scored '++'. These scores should be reversed as FR116 is open farmland adjacent to a Local Nature Conservation Area (LNCS) and would be adversely impacted by large scale development, visually and physically by influx of population. No significant green networks or prospect of achieving connectivity with existing settlement due to land separating outwith the bid site. FR022 established tree belts would be retained/ enhanced and there is direct connectivity to Balmedie and Blackdog by pedestrian, cycle and road links.	Disagree. The scale of FR116 allows for green network opportunities with the LNCS. However, its score will be '+', in line with the scoring methodology. The ER shows site FR022 scoring '0' for biodiversity, but the scale of the proposal could allow for biodiversity enhancement.	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			Therefore, it should score '0/+' post-mitigation.	
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bids FR022 and FR116	On Material Assets, FR116 scored '+'. Score should be reversed with FR022's '0'. There is no grade separated junction proposed off the A90 for Menie now and the site is not in the same ownership for the land needed to access the location for the junction. Deliverability of this is uncertain. Traffic, including construction, will have to go through the village. And Belhelvie Community Council has opposed the site's reserved status, as it has not been demonstrated that it can be developed without serious adverse impact on the existing settlement. FR022 is directly connected to grade separated junction.	It is agreed that site FR022 will have positive effects on affordable housing and possible new primary school. Amended pre-mitigation score to '+/-' and post-mitigation score to '+'. No change proposed to FR116.	Appendix 8.5.3
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bids FR022 and FR116	On Material Assets, FR116 scored '+'. Score should be reversed with FR022's '0'. FR022 will have no long-term impact on sewage network or school without appropriate investment any more than FR116 will have. FR022 could provide a primary in an accessible location for the wider Balmedie catchment and both sites can be remedied by developer obligations.	It is agreed that site FR022 will have positive effects on affordable housing and possible new primary school. Amended pre-mitigation score to '+/-' and post-mitigation score to '+'. No change proposed to FR116.	Appendix 8.5.3
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bid FR022	On Population, FR022 should not be scored down as a mix of house types has not been proposed (other than affordable housing). Housing market influences/changes house types and proposals will respond to market conditions at the time of commencement. MIR is speculative and not binding particularly when it is to be reserved.	Disagree, as mitigation measures will be applied, to meet the LDP policies. Post-mitigation score is '+'. Therefore, no change is required.	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bid FR022	On Human Health, SEA is factually inaccurate as bid site is not currently recreational open space but agricultural land; formally a golf course which ceased operations. Bid proposes over 40% recreational open space.	Agreed. The Environmental Report and the full assessment have been updated. Score will change to 0/+.	Appendix 8.5.3
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bid FR022	On Human Health bid FR022 was a former golf course, which is referred elsewhere as loss of recreational land rather than greenfield site.	No change required. As the site as not been a golf course for some time, it is appropriate to regard it as a greenfield site. No further development has occurred on this site.	Appendix 8.5.3
Case Consulting Limited on behalf of West Balmedie Estate	Site Assessment - Bids FR022 and FR116	Environmental assessment for FR022 and FR116 have not been undertaken in a consistent and impartial manner, include false/ misleading information and have been manipulated to support pre-determined recommendation, undermining the entire process.	Disagree. Scores will differ due to scale and location of these sites. FR022 scores poorly on water quality, and has less human health, biodiversity enhancement and material asset opportunities. However, the score for Human Health will be amended to reflect that the golf course is now agricultural land, to '0/+'.	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment - Bid FR025	This site in Belhelvie is adjacent to an area of semi natural woodland included in the AWI as long-established plantation origin (LEPO) and does not consider possible adverse effects to adjacent woodland. Recommend mitigation/enhancement as new native woodland/ connectivity.	The Environmental Report and the full assessment have been updated. Effects could be mitigated by a buffer strip / new planting to encourage connectivity.	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Scottish Natural Heritage	Site Assessment - Bid FR031	SEA omits potential biodiversity impacts e.g. woodland, scrub and adjacent to the river.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bid FR034	On cultural heritage, potential negative impact on setting may be partly mitigated by structural planting. There will be direct impact on the inventory garden and design landscape GDL00206.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bid FR034	On cultural heritage, agree with conclusion that designed landscape will require sensitive approach to the design.	Noted. No action required.	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment – Bids FR061 and FR062	The SEA in Oldmeldrum doesn't note that these sites partially overlap with an area of carbon rich soil and peatland.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bids FR068, FR083, FR110 and FR111	On cultural heritage, potential impacts on the Battle of Barra battlefield, which should be considered direct rather than a setting impact. Agree potential for adverse impact on these sites. There is potential for cumulative impacts for sites FR068, FR083, FR110 and FR111.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bid FR068	On cultural heritage, potential impacts on battlefield. Although located adjacent to existing development, it is however located in the vicinity of an important area of fighting associated with the battle (i.e. Old Meldrum).	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Scottish Natural Heritage	Site Assessment - Bid FR081	In Daviot, the landscape effect should be negative - the assessment identifies negative impacts, but then goes on to say that the effects are only likely to be medium term as over the long term what gets developed becomes part of the landscape.	Disagree. While there will be an impact on the landscape, the location and scale of the proposal will not negatively affect the landscape.	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment – Bid FR083	Preferred site that does not relate well to settlement pattern, nonetheless scores '0' in SEA on the basis that what gets developed becomes part of the landscape in the long term.	Agree that bid FR083 is likely to have a significant negative impact on the setting of Oldmeldrum. Score post-mitigation has been changed from neutral to --/?, to reflect the options available.	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bid FR083	Have concerns it would be located within an important area associated with the battle and close to an area of fighting (i.e. The Bruce's Stone and the Comyn Lines). It sits within an area of high archaeological potential, and may result in the encroachment of modern development towards the centre of the battlefield.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bid FR089	On cultural heritage, potential for adverse impact on schedule monument SM3277 (Hare Cairn). Restricting development to the east (next to the road) may help mitigate impact.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bid FR090	On cultural heritage, without mitigation there is potential for adverse impact on both the site and setting of Category A Listed Old Bridge of Ellon.	The Environmental Report and the full assessment has been updated to reflect the	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			issue raised (and any mitigation measures).	
Scottish Natural Heritage	Site Assessment - Bid FR092	Consider this preferred site in Ellon may generate significant landscape and visual impacts, but this is not reflected in the SEA.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bids FR094, FR095 and FR096	On cultural heritage, these sites have the potential impact on views from the Great Garden, which should be considered in terms of the setting both of the A listed building and the designed landscape. Agree with the potential negative impact.	The Environmental Report and the full assessment have been updated to reflect the issues raised (and any mitigation measures).	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment – Bid FR098	The MIR identifies landscape impacts and other constraints for this non-preferred bid. The SEA assessment and scoring is not in keeping with this.	Agree. The scores have been changed to negative to reflect the impact on St Katherine's, which would be difficult to mitigate.	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bid FR110	Welcome that FR110 is a non-preferred allocation as this would be located in the vicinity of an area of fighting and important places associated with the battle (i.e. The Bruce Field and the Comyn Lines).	Noted. The Environmental Report and the full assessment have been updated to reflect the issue raised.	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment - Bid FR115	The SEA assesses this preferred bid in Kirkton of Auchterless for 12 homes and does not identify landscape issues. The MIR states that this site is reserved for 45 homes and more accurately identifies a landscape impact. Not clear on this basis why it is a preferred site. It is shown as a future opportunity site in the draft proposed LDP.	The MIR increased the number of homes as this is a large site. However, it is not preferred. Environmental Report and the full assessment have been updated to reflect the	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			landscape issue (and any mitigation measures).	
Ms Emma Paterson	Site Assessment - Bid FR116	The SEA states development would increase the accessible areas for informal recreation and therefore public access to the dune system. This is certain to have a significant detrimental impact on the local environment and natural beauty. The increase in public access would have a devastating impact (litter, noise, dog walking and fouling, domestic cats) on the fragile local flora (Marram grass, Northern Marsh Orchid, Wild Pansy) and wildlife (deer, Buzzards, marine birds and mammals, etc). Areas of natural beauty and established woodland should be protected wherever possible.	Noted. No action required. However, mitigation measures, such as adding to the open space, creating green networks would mitigate possible effects.	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment – Bid FR120, FR121, FR122	On the basis of the text in the landscape section of the SEA, site in Potterton should score ‘-’, not ‘0’. Indeed, the MIR states that the landscape impact of these bids would be unacceptable.	Agree. The Environmental Report and the full assessment have been updated to reflect the issues raised (and any mitigation measures).	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment – Bid FR120, FR121, FR122	Disagree with the statement “The development of a greenfield site is unlikely to have long-term adverse impacts on biodiversity through the loss of habitats and disturbance to species that use the site as a habitat.”	Agree. The proposal is agricultural land, and this statement has been deleted for bids FR120 to FR122.	Appendix 8.5.3
Historic Environment Scotland	Site Assessment - Bid FR123	On cultural heritage, there is potential for an adverse impact on Scheduled monument SM3275 (The Temple Stones, stone circle NE of Potterton House).	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Historic Environment Scotland	Site Assessment - Bids FR125 and FR126	On cultural heritage, welcome acknowledgement of impact on battlefield, but there is potentially adverse impacts on setting of Fyvie Castle inventory garden and designed landscape.	The Environmental Report and the full assessment have been updated to reflect the issues raised (and any mitigation measures).	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment – Bid FR134	It isn't clear why this proposal in Turriff on agricultural land is assessed as '-' for biodiversity in comparison with others on similar land that are assessed as '0' or '0/+'. We note that the MIR states that red squirrels have been found on the site before and that a wildlife and habitat appraisal is required. The site boundary appears to have been drawn to exclude adjacent trees.	Noted. Red squirrel and badger are known to use this area, and the score has been changed to – for pre-mitigation and 0/- for post mitigation, as most of the site is a field, but does include scrub.	Appendix 8.5.3
Scottish Natural Heritage	Site Assessment – Bid FR134	It isn't clear why this proposal in Turriff on agricultural land is assesses for Landscape impact – it poorly relates to Turriff/Little Turriff, but this is not reflected in the score.	Agree. The Environmental Report and the full assessment have been updated to reflect the issues raised (and any mitigation measures).	Appendix 8.5.3
Halliday Fraser Munro on behalf of Claymore Homes	Site Assessment – Bid FR139	Development of site FR139 is unlikely to impact on air quality in Ellon, given it is located in Udney Station. The effect should be neutral.	Disagree. The ER notes there could be a risk of increasing traffic in Ellon due to the scale of the proposal, as Ellon is a main service centre, unlike Udney Station, which has very few services.	Appendix 8.5.3
Halliday Fraser Munro on behalf	Site Assessment – Bid FR139	An upgrade to the WWTW would not have a detrimental impact to water quality. The impact should be neutral.	Agree. The post-mitigation score has been changed to neutral.	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
of Claymore Homes				
Halliday Fraser Munro on behalf of Claymore Homes	Site Assessment – Bid FR139	There is no potential increase in CO ₂ for site OP1 (FR138), it is unclear how there would be a negative impact from site FR139. The effect should be neutral.	Disagree. Bid FR139 proposes almost twice as many homes as OP1.	Appendix 8.5.3
Halliday Fraser Munro on behalf of Claymore Homes	Site Assessment – Bid FR139	Site OP1 in Udney Station is not identified as having a landscape impact. It is unclear why site FR139 would have a significant impact, as it is within the same field boundary and the nature of land use in the area is already changing. The effect would be neutral.	Disagree. Bid FR139 is a larger site than OP1, and given the scale of Udney Station, will have a different landscape and visual impact.	Appendix 8.5.3
Halliday Fraser Munro on behalf of Claymore Homes	Site Assessment – Bid FR139	Infrastructure for site FR139 will be reviewed and mitigation will be applied. High quality new assets of housing employment open space and biodiversity improvements will be provided. The effect will be slightly positive.	No action required. The ER scores '±/+' for material assets as there will be new assets, but impact on education and WWTW are unknown.	Appendix 8.5.3
Halliday Fraser Munro on behalf of Harper & Cochrane Ltd	Site Assessment – Bids FR142 and FR143	The respondent agrees with the SEA, which highlights the sites have access to a busy bus route, reducing the need to use the private car.	Noted. No action required.	Appendix 8.5.3
Halliday Fraser Munro on behalf of Harper & Cochrane Ltd	Site Assessment – Bids FR142 and FR143	The SEA makes reference to a visual impact assessment being required if the sites were to be allocated. Respondent notes that this can be provided in support of any planning application proposals, although the development proposal will alter the current character of the farmland; the landscape around Foveran has the	Noted. No action required.	Appendix 8.5.3

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		capacity to accept an appropriately laid out large scale development.		
Scottish Environment Protection agency	Site Assessment – OP1 in Insch	Request the ER is updated to reflect comments on Insch OP1 regarding flood risk.	This site has full planning permission and construction is due to start in 2020.	Appendix 8.5.4
Shepherd & Wedderburn LLP on behalf of Mr & Mrs Dix	Site Assessment – Insch	The SEA should include an assessment of the Household Waste and Recycling Centre in Insch. The location of this facility has a negative impact on health.	Disagree. Existing facilities that are not identified as Protected Land in the LDP will not be subject to the SEA.	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bid GR005	On cultural heritage, welcome identified of potential impacts on Cat B listed Kinellar House.	Noted. No action required.	Appendix 8.5.4
Bennachie Community Council	Site Assessment – Bid GR029	The SEA for GR029 is misleading and inconsistent with regards to prime agricultural land. The SEA understates the scale of prime land that would be lost to development. Wording should be more like that for sites in Old Rayne.	Agreed. The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bid GR033	On cultural heritage, SEA does not identify potential impacts on Category B listed Kinellar House and its designed landscape setting.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bids GR013 and GR107	On cultural heritage, SEA does not identify the potential significant impact on Scheduled monument Donald's	The Environmental Report and the full assessment have been updated to	Appendix 8.5.4

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		Hilloack, cairn. Cumulative impacts of both sites could be significantly adverse.	reflect the issue raised (and any mitigation measures).	
Historic Environment Scotland	Site Assessment – Bid GR035	On cultural heritage, SEA does not consider likely significant impact on Scheduled monument SM12924 (Old Rayne) where it is difficult to see how this could be mitigated.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.4
Farningham Planning Ltd on behalf of Barratt North Scotland and Dunecht Estates	Site Assessment – Bids GR039, GR040 and GR041	The SEA concludes very positively for these sites when compared to other bid sites around Westhill, although issues are raised regarding the existing settlement, Loch of Skene, Dunecht house designed landscape, Ancient Woodland and protected species. All of these can be integrated into an existing development without prejudice or adverse impacts.	Noted, but our concerns on built heritage for the largest site, GR041 for 2500 homes remains. No action required.	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bid GR041	On cultural heritage, it is not clear whether or not this includes consideration of potential impact on Scheduled monument Woods of Carnie, as views may open up if the trees are felled.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.4
Mr Stephen McMin	Site Assessment – Bid GR048	On water, Dunecht WWTW has no bearing on Durno and there is no growth project to improve water connection.	Agreed. As only private sewerage treatment is proposed, which is discouraged by SEPA, the score for Water quality has been changed to negative.	Appendix 8.5.4
Mr Stephen McMin	Site Assessment – Bid GR048	On water, impacts on the watercourses during the construction phase will not be short term nor neutral.	Disagree, as appropriate measures must be applied.	Appendix 8.5.4

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Mr Stephen McMinn	Site Assessment – Bid GR048	On water, the site is bounded on two sides by watercourses and there is an identified flood risk to adjacent land / properties that will be exacerbated by the development.	Noted. A flood risk assessment would be required, and development would avoid these areas. The Environmental Report and the full assessment have been updated to reflect the issue raised (and mitigation measures).	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On water, the soakaways will take water and septic tank runoff directly into the watercourse increasing pollution as there is insufficient soil depth for any system to work properly.	Agreed. As only private sewerage treatment is proposed, which is discouraged by SEPA, the score for Water quality has been changed to negative.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On water, rainwater from house roofs and the large area of tarred surfaces will cause water to enter the watercourse at greater speed and without diffusion increasing the flood risk downstream at the culvert under the road.	Noted, although this would apply to all developments. No action required.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On water, SEPA have stated that the only acceptable solution for wastewater is first line sewage treatment works and do not support further septic tanks to an area. Because of the proliferation of private drainage, Durno has been put forward for inclusion in SEPA's cumulative drainage impact area [drainage hot spot].	Agreed. As only private sewerage treatment is proposed, which is discouraged by SEPA, the score for Water quality has been changed to negative.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On water, because of the impact on watercourses during and after construction, water quality from septic tanks,	Agreed. As only private sewerage treatment is proposed, which is discouraged by SEPA, the	Appendix 8.5.4

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		and flood risk, the effect post mitigation will be negative at least, possibly significantly negative.	score for Water quality has been changed to negative. The scale of the proposal does not merit a significant negative impact.	
Mr Stephen McMinn	Site Assessment – Bid GR048	On climatic Factors, the development will have a long-term negative impact due to increased travel requirements and increased emissions as public transport is non-existent and the community is totally car reliant.	Noted, but the scale of the proposal does not merit a negative impact.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On soil, the proposed development will have long-term adverse effects as it will destroy an area of prime agricultural land and have a negative effect on the surrounding land use. There is no evidence of need for further housing in Durno as evidenced by the sites for 8 houses presently unsold and undeveloped in the settlement and the loss of open space and agricultural land cannot be justified. The effect post mitigation will be significantly negative.	Noted, no action required. The score for soil quality will remain negative. No action required.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On biodiversity, the development of a greenfield site cannot fail to have long-term adverse impact on biodiversity and this development will not conserve, protect and enhance the diversity of species and habitats.	Disagree. Biodiversity enhancement and buffer strips alongside the watercourse is proposed.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On biodiversity, any biodiversity enhancements proposed will still be less than exists on site at present and the area of open space will be substantially reduced. The effect post mitigation will be negative.	The site has a watercourse running through fields, with a few trees. Buffer strips would be required, which would have neutral effects due to the small scale of the	Appendix 8.5.4

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			proposal. No action required.	
Mr Stephen McMinn	Site Assessment – Bid GR048	On landscape, the development will destroy the open, pleasant nature of the existing community and cannot be mitigated against as it will be a prominent addition to the settlement. No amount of landscaping can compensate for obtrusive, badly placed developments. The effect post mitigation will be negative at least, possibly significantly negative.	No action required. The proposal would join two areas of ribbon development together, and this area is a logical location to extend Durno, which has some development around bid GR048.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On material assets, the comments regarding Alford Academy and Cluny primary school are misplaced. The proposal will lead to additional pressure on local infrastructure, especially Logie Durno school.	No action required. A proposal of this scale (8 homes) would not significantly impact on local infrastructure.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On population, there are only 2 house types proposed, large detached houses (6) and affordable houses (2), which will not be suitable for all groups of the population.	No action required. While the houses would be detached, they would offer different number of bedrooms. Policy P1 (Design) would also apply.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	On human health, this development will result in the loss of open space at the heart of the community.	No change required. This site is comprised of trees and fields. It is not formal open space. Open space would also be required as part of the proposal to meet Policy P2 (open space).	Appendix 8.5.4

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Mr Stephen McMinn	Site Assessment – Bid GR048	On human health, there are only 2 affordable houses proposed so this will have a minimal effect for those with no previous access to housing and only then if they have a car.	No action required. This is a policy requirement.	Appendix 8.5.4
Mr Stephen McMinn	Site Assessment – Bid GR048	Overall, this Environmental Assessment is flawed, as a number of the key issues will have a negative or significantly negative effect even post mitigation. Any development on this site cannot be mitigated against and will result in further pollution of water courses as well as negatively altering the character of the settlement.	No change required. While there will be local impacts, overall, there will be few significant impacts due to the number of homes and scale of the site.	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bids GR050 and GR060	On cultural heritage, welcome identification of potential for significant adverse impacts - agree there is some potential to mitigate.	Noted. No action required.	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bid GR050, GR60, GR89, GR90, and GR91	On cultural heritage, cumulative impacts with these sites should be taken into account.	The Environmental Report and the full assessments have been updated to reflect the issues raised (and any mitigation measures).	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bids GR057, GR058 and GR059	On cultural heritage, there is limited knowledge on the Inventory battlefield Battle of Harlaw, therefore the level of impact is uncertain. Cumulative impacts with GR057, GR058 and GR059 should be considered.	The Environmental Report and the full assessments have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bids GR089, GR090 and GR091	On cultural heritage, welcome identification of potential for significant adverse impacts - agree some potential to mitigate.	Noted. No action required.	Appendix 8.5.4

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Historic Environment Scotland	Site Assessment – Bids GR064, GR070, GR100, GR123, GR132 and GR133	On cultural heritage, possible the impact on the setting of Scheduled monument Berryhill could be mitigated by (small) scale and layout of the proposal. Cumulative impacts with allocations at GR064, GR70, GR100, GR123, GR132 and GR133 should be considered.	This issue has been raised in a modification to the cumulative effects assessment of the ER.	Appendix 8.6
Historic Environment Scotland	Site Assessment – Bid GR069	On cultural heritage, welcome identification of potentially significant impact on Category A listed building Westhall House, and would welcome opportunity to comment on any mitigation proposals.	Noted, no action required. Bid GR069 is not supported, no mitigation is necessary	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bid GR094	On cultural heritage, potential significant adverse impact on the setting of Scheduled Monument Upper Corskie.	The Environmental Report and the full assessments have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bid GR099	On cultural heritage, potential impact on setting of Scheduled monument Tillyorn including views to/from. Likely some views may be screened by intervening buildings and not likely be significant for HES interests.	The Environmental Report and the full assessments have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bid GR108	On cultural heritage, consideration needs to be given to impact on setting of Scheduled monument Mote Hill. Possible that impacts are not likely to be significant for HES interests due to topography and trees.	Noted. The Environmental Report and the full assessments have been updated to reflect the issue raised.	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bid GR117	On cultural heritage, welcome acknowledgement of potential for significant adverse impact on setting of Category A listed building Bourtie House.	Noted. No action required.	Appendix 8.5.4

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid GR117	The air quality assessment should reflect the potential to re-route traffic around a northern bypass of Inverurie.	No action required. Access onto the A96 is not secured and the scale of proposal will affect Inverurie, which is a key service centre.	Appendix 8.5.4
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid GR117	Careful design and masterplan will mitigate impacts on landscape. SEA score should better reflect this.	Pre-mitigation score has been changed to from 0/- to negative given the scale of the proposal (500 homes), but the post mitigation score (0/-) reflects likely mitigation measures and will remain.	Appendix 8.5.4
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid GR117	Careful design and masterplan will mitigate impacts on woodland. SEA score on biodiversity should better reflect this.	No action required. The proposal will result in loss of trees and ancient woodland. Compensatory planting would be required. Pre-mitigation score (-) and post mitigation score (0/-) are deemed appropriate.	Appendix 8.5.4
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid GR117	Careful design and masterplan will mitigate impacts on the setting of the A-listed Bourtie House. SEA score should better reflect this.	No action required. Mitigation measures could reduce its impact, but there would still be a negative impact on the listed building. Pre-mitigation score (--) and post mitigation score (-) are deemed appropriate.	Appendix 8.5.4

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Halliday Fraser Munro on behalf of Mr Michael Westwater & Mr John McIntosh	Site Assessment – Bid GR118	Object to negative effects on water post mitigation as concerns can be addressed through suitable drainage solutions.	No action required. There are water quality issues (SEPA identifies this area as unsuitable for septic tanks) and there is no public sewerage in the area.	Appendix 8.5.4
Halliday Fraser Munro on behalf of Mr Michael Westwater & Mr John McIntosh	Site Assessment – Bid GR118	Object to negative effects on cultural heritage post mitigation as concerns can be addressed through careful design.	No action required. Open space adjacent to the site would lessen the impact on the listed building, but as the design of the site would be decided at the time of a planning application, the post mitigation score will remain unchanged (--/?).	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bid GR131	On cultural heritage, SEA does not identify the potential impact or future impact (if trees are felled) of Scheduled monument Bruce's Camp, hillfort.	The Environmental Report and the full assessments have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.4
Halliday Fraser Munro on behalf of CALA Homes (North) Ltd	Site Assessment – Bid GR133	Site is not at risk from flooding resulting in an overall neutral / positive effect.	Disagree. A small part of the site is at risk from surface water flooding, and the SEA of this site will be amended to reflect it is only a small area. However, the neutral post-mitigate score will remain. The SEA does not give any positive scores for climatic factors.	Appendix 8.5.4

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Halliday Fraser Munro on behalf of CALA Homes (North) Ltd	Site Assessment – Bid GR133	Site has negligible landscape impact resulting in an overall neutral / positive effect.	Disagree. The SEA does not give any positive scores for landscape as a proposal is unlikely to improve an existing landscape.	Appendix 8.5.4
Halliday Fraser Munro on behalf of CALA Homes (North) Ltd	Site Assessment – Bid GR133	Site has a positive impact on assets associated with the recreation areas, and provides additional open space, enhanced core paths resulting in an overall neutral / positive effect.	It is agreed that as the proposal includes a public park, it would have as positive impact. There is also sufficient education capacity. The scores for biodiversity and material assets were amended to reflect this.	Appendix 8.5.4
Halliday Fraser Munro on behalf of CALA Homes (North) Ltd	Site Assessment – Bid GR133	Site only has limited and acceptable impacts on the pipeline consultation area, resulting in an overall neutral / positive effect.	Agreed. The Environmental Report and the full assessments have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.4
Halliday Fraser Munro on behalf of CHAP Group (Aberdeen) Ltd	Site Assessment – Bid GR135	Site GR135 would have a neutral effect on all elements in the SEA apart from landscape. This could be mitigated through a well-designed development.	Noted. No action required.	Appendix 8.5.4
Historic Environment Scotland	Site Assessment – Bids KN050 and KN051	On cultural heritage, impacts can be mitigated by design. HES would welcome opportunity to comment on any mitigation proposals.	Noted. No action required. These bids are not supported.	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Historic Environment Scotland	Site Assessment – Bid KN055	On cultural heritage, no details of how impacts can be mitigated. HES would welcome opportunity to comment on any mitigation proposals.	Noted. Half of this site already has planning permission (APP/2011/3100), which contains most of the historic interests. They were assessed as part of an Environmental Impact Assessment (EIA). This would be required for the remaining part of the site and include an archaeological assessment. A development framework and masterplan has already been agreed for this bid in 2013. If the whole site is allocated, an archaeological assessment as part of an EIA would be required. The ER and full bid assessment will be updated to reflect the above.	Appendix 8.5.5
Keppie Planning on behalf of Stewart Milne Homes	Site Assessment – Bid KN057	On material assets site KN057 would include a new primary school, which will improve existing education capacity issues.	Agreed, but the need for a new school for 400 homes will be decided by the Council's Education Service, not the developer. Score on material assets has been changed to mixed.	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Keppie Planning on behalf of Stewart Milne Homes	Site Assessment – Bid KN058	Change post mitigation score on air quality from -/0 to 0 as the existing public transportation links and the encouragement of safe walking and cycling routes through the site, which also allow access to the proposed business uses at the western end of the site, will promote less reliance on cars, and therefore the effect is expected to be neutral.	Disagree. No action required. This scale of development will have an impact on air quality. Score reflects mitigation measures.	Appendix 8.5.5
Keppie Planning on behalf of Stewart Milne Homes	Site Assessment – Bid KN058	Change post mitigation score on water quality from 0 to + as the existing water features on the site will be incorporated into the masterplan design where wetland park will be a considerable benefit to the existing and proposed community.	Agreed. The ER has been amended to reflect that a wetland will be masterplanned into the development.	Appendix 8.5.5
Keppie Planning on behalf of Stewart Milne Homes	Site Assessment – Bid KN058	Keep post mitigation score on climatic factors as -/?, but suggested it is acknowledged and accepted that a Flood Risk Assessment would be required to support any future planning applications on the site.	Agreed. Given the extent of the flood risk on this site, the ER for this bid has been amended.	Appendix 8.5.5
Keppie Planning on behalf of Stewart Milne Homes	Site Assessment – Bid KN058	Change post mitigation score on biodiversity from -/+ to + as the creation of the wetland park will also see the creation and enhancement of natural habitats, which will result in a positive benefit.	Disagree. No action required. The proposal will result in the loss of peatland to development.	Appendix 8.5.5
Keppie Planning on behalf of Stewart Milne Homes	Site Assessment – Bid KN058	Change post mitigation score on landscape from --/- to -/0 as the integrity of the Green Belt in relation to the function of the Green Belt in this location will not be significantly negatively affected. The site was covered by the Portlethen Corridor Capacity Study 2008 and featured in 4 out of 4 of the development options in that study, thus indicating that development in this local was previously viewed as being acceptable and logical. The masterplan	Disagree. The Capacity Study considered long term planning options and the green belt is a planning tool, not an environmental tool. Later landscape studies have shown the sensitivity of this area to development. As significant development is concentrated in	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		provides substantial woodland planting proposals which will limit the impact on the landscape.	Chapelton there is no need for large scale development in Portlethen.	
Keppie Planning on behalf of Stewart Milne Homes	Site Assessment – Bid KN058	Change post mitigation score on material assets from – to + as the proposed development of site KN057 includes a new primary school which will improve existing education capacity issues. The wetland park will also be a material asset which would provide a positive benefit to the local community and beyond.	Partially agree. The ER and full bid assessment have been amended. Score will be +/- given the need to upgrade the road network.	Appendix 8.5.5
Keppie Planning on behalf of Stewart Milne Homes	Site Assessment – Bid KN058	Change post mitigation score on population from + to ++ as it is expected that the 1550 residential units proposed would form a mix of with a mix of 2, 3, 4 and 5 bed detached, semi-detached, terraced and flatted properties which will complement the existing residential development to the south and east. The proposal would also include flatted properties above the commercial space, which will create an active and vibrant community atmosphere. SMH is committed to providing the affordable units within the early phasing of the development of the site. The development would result in a major positive impact in terms of population.	No action required. The SEA does not give any significant positive scores for population as the age of people who occupy homes is unknown. A positive score is only provided for mix of house types or provision of care facilities.	Appendix 8.5.5
Historic Environment Scotland	Site Assessment – Bid KN064	On cultural heritage, SEA does not identify potential adverse impact on setting of Category B listed building Keith's Tower that has a key relationship with Category A listed Park Bridge.	The Environmental Report and the full assessments have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.5
Halliday Fraser Munro on behalf	Site Assessment – Bid KN064	The proposal would improve air quality compared with the existing use (quarry). As such, the score should be at least neutral.	Disagree. This is acknowledged in the ER, but the number of homes	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
of CHAP Group (Aberdeen) Ltd			and lack of buses will affect air quality.	
Halliday Fraser Munro on behalf of CHAP Group (Aberdeen) Ltd	Site Assessment – Bid KN064	The development is likely to improve the level of run-off into the River Dee from the existing quarry operations on site KN064. The score should be neutral.	Disagree. A housing development will create its own pressures on the River Dee. Score should remain uncertain.	Appendix 8.5.5
Halliday Fraser Munro on behalf of CHAP Group (Aberdeen) Ltd	Site Assessment – Bid KN064	Improved Bus services and lack of flooding suggest that the overall effect of site KN064 on Climate would be neutral.	Disagree. Scale and location of development, and uncertainty of Park Bridger means is unlikely bus services would increase.	Appendix 8.5.5
Halliday Fraser Munro on behalf of CHAP Group (Aberdeen) Ltd	Site Assessment – Bid KN064	Site KM064 is located on the lower slopes of the Special Landscape Area. The Area is characterised by a strong woodland framework and the development would be enclosed by perimeter woodland. Impact on landscape would be neutral.	Disagree. The proposal will introduce development (buildings) where there is very little.	Appendix 8.5.5
Halliday Fraser Munro on behalf of CHAP Group (Aberdeen) Ltd	Site Assessment – Bid KN064	Site KN064 will reduce speeds on the A93, resulting in a slightly positive impact on material assets.	Disagree. This is an assumption and not deemed a material asset.	Appendix 8.5.5
Halliday Fraser Munro on behalf of CHAP Group (Aberdeen) Ltd	Site Assessment – Bid KN064	For site KN064 additional use of the private car may be likely, but car-based travel cannot be avoided across most of Aberdeenshire. The development provides opportunity to provide additional public transport for the whole of the Deeside Corridor.	Disagree. This is an assumption and rural bus provision is currently declining.	Appendix 8.5.5
Mr Stephen Coutts	Site Assessment – Bids KN069,	SEA offers a thorough assessment of the key environmental factors likely to be affected by the proposed	Noted. No action required.	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
	KN070, KN071 and KN072	developments at Banchory-Devenick. The overall and cumulative 'negative' and 'significant negative' effects on air, water, climatic factors, biodiversity, landscape, material assets, cultural heritage (even post-mitigation) cannot be ignored, with only soil and human health identified as neutral. The one positive is population. The SEA table states objective reasons for the bid to be deemed 'not preferred'.		
Ms Anco Maan	Site Assessment – Bids KN069, KN070, KN071 and KN072	SEA provides a thorough assessment of key environmental factors likely to be affected by these sites and agrees reasons for these sites being 'not preferred'.	Noted. No action required.	Appendix 8.5.5
Ms Lorraine Maan-Beck	Site Assessment – Bids KN069, KN070, KN071 and KN072	SEA provides a thorough assessment of key environmental factors likely to be affected by these sites and agrees reasons for these sites being 'not preferred'.	Noted. No action required.	Appendix 8.5.5
Ms Nicola Maan	Site Assessment – Bids KN069, KN070, KN071 and KN072	SEA offers a thorough assessment of the key environmental factors likely to be affected by the proposed developments. The overall and cumulative 'negative' and 'significant negative' effects on air, water, climatic factors, biodiversity, landscape, material assets, cultural heritage (even post-mitigation) cannot be ignored, with only soil and human health identified as neutral. The one positive is population. The SEA table states objective reasons for the bid to be deemed 'not preferred'.	Noted. No action required.	Appendix 8.5.5
Mr Loran Maan	Site Assessment – Bids KN069, KN070, KN071 and KN072	SEA offers a thorough assessment of the key environmental factors likely to be affected by the proposed developments. The overall and cumulative 'negative' and 'significant negative' effects on air, water, climatic factors, biodiversity, landscape, material assets, cultural heritage	Noted. No action required.	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		(even post-mitigation) cannot be ignored, with only soil and human health identified as neutral. The one positive is population. The SEA table states objective reasons for the bid to be deemed 'not preferred'.		
Banchory Community Council	Site Assessment – Bids KN069, KN070, KN071 and KN072	SEA provides a thorough assessment of key environmental factors likely to be affected by these sites, and agrees reasons for these sites being 'not preferred'.	Noted. No action required.	Appendix 8.5.5
Mr Brian J Stewart Protect Banchory Devenick	Site Assessment – Bids KN069, KN070, KN071 and KN072	The area known as Banchory Devenick has no National or Local designated sites, but this should not detract from its importance with regard to protected species and its wider biodiversity and geodiversity. There are a number of Schedule 1 species present on these sites and there is diversity in the flora and fauna.	Noted. No action required.	Appendix 8.5.5
Mr Richard Woollcombe	Site Assessment – Bids KN069, KN070, KN071 and KN072	SEA provides a thorough assessment of key environmental factors likely to be affected by these sites, and agrees reasons for these sites being 'not preferred'.	Noted. No action required.	Appendix 8.5.5
Ms Pat Brodie	Site Assessment – Bids KN069, KN070, KN071 and KN072	SEA is a thorough assessment of the key environmental factors likely to be affected by the proposed developments.	Noted. No action required.	Appendix 8.5.5
Mr Alan Haig	Site Assessment – Bids KN069, KN070, KN071 and KN072	Supports the thorough assessment of key environmental factors the SEA provides, the overall cumulative negative and significant effects, and the objective reasons given for these bids to be 'not preferred'.	Noted. No action required.	Appendix 8.5.5
Ms Heather Haig	Site Assessment – Bids KN069,	Supports the thorough assessment of key environmental factors the SEA provides, the overall cumulative negative	Noted. No action required.	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
	KN070, KN071 and KN072	and significant effects, and the objective reasons given for these bids to be 'not preferred'.		
Mr G Neil McKay	Site Assessment – Bids KN069, KN070, KN071 and KN072	The SEA assessment identifies overall and cumulative negative and significant effects on air, water, climatic factors, biodiversity, landscape, material assets and cultural heritage. These are objective reasons why the bid should not be preferred.	Noted. No action required.	Appendix 8.5.5
Mr Christopher Hennigan	Site Assessment – Bids KN069, KN070, KN071 and KN072	SEA offers a thorough assessment of the key environmental factors likely to be affected by the proposed developments. The overall and cumulative 'negative' and 'significant negative' effects on air, water, climatic factors, biodiversity, landscape, material assets, cultural heritage (even post-mitigation) cannot be ignored, with only soil and human health identified as neutral. The one positive is population. The SEA table states objective reasons for the bid to be deemed 'not preferred'.	Noted. No action required.	Appendix 8.5.5
Mr Phil Allan	Site Assessment – Bids KN069, KN070, KN071 and KN072	The SEA is a thorough assessment of key environmental factors and the overall and cumulative "negative" and "significant negative" effects on air, water, climatic factors, biodiversity, landscape, material assets and cultural heritage (even after mitigation) cannot be ignored for sites KN069 to KN072 . The SEA states objective reasons for the bid to be "not preferred".	Noted. No action required.	Appendix 8.5.5
Historic Environment Scotland	Site Assessment – Bid KN087	On cultural heritage, SEA does not appear to consider impact on Scheduled monument Cowie Line.	The Environmental Report and the full assessment have been updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Historic Environment Scotland	Site Assessment – Bid KN089	On cultural heritage, it is not clear whether the potential adverse impact relates to Scheduled monument SM5935.	Guthrie Hill cairn is southwest of Montrose and will not be affected by the proposal. SM SM5936 (Marykirk) and SM3313 (St Cyrus) could be affected. The ER has been amended to clarify this.	Appendix 8.5.5
Historic Environment Scotland	Site Assessment – Bid KN108	On cultural heritage, in addition to landscape and visual impact assessment, a setting assessment should be identified, which is a separate discipline/ methodology for assessing impact on Scheduled monument at Dunnottar Castle.	Disagree. Setting is considered as part of a Visual Impact Assessment. However, the Environmental Report and the full assessment will be updated to reflect the issue raised (and any mitigation measures).	Appendix 8.5.5
Historic Environment Scotland	Site Assessment – Bid KN110	On cultural heritage, welcome identification of positive impact particularly as caveated that infill development will not be supported.	Noted. No action required.	Appendix 8.5.5
Clarendon Planning & Development Ltd on behalf of The Sluie Estate Trust	Site Assessment – Bid KN115	On air quality, ER is incorrect, as the foodstore would reduce a significant proportion of current long-distance car journeys to other settlements for supermarkets (75% Aberdeen City and Aberdeenshire Retail Study 2013) and is reachable by sustainable means of transport. Therefore, would have a long-term positive benefit on air quality.	No action required. The SEA does not give any positive scores for air quality as there is no means for a proposal to improve it.	Appendix 8.5.5
Clarendon Planning & Development Ltd	Site Assessment – Bid KN115	On climatic factors, ER is incorrect as the foodstore would reduce long-distance car journeys to other settlements for supermarkets (75% Aberdeen City and Aberdeenshire Retail Study 2013) and is reachable by walking from the	No action required. The SEA does not give any positive scores for climatic factors as all proposals are likely to	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
on behalf of The Sluie Estate Trust		Ury Estate. Therefore, it would have a long-term positive impact due to the potential for a reduction in car travel requirements.	produce emissions. A store of this scale would also attract shoppers outside Ury who would drive to it.	
Clarendon Planning & Development Ltd on behalf of The Sluie Estate Trust	Site Assessment – Bid KN115	On soil, ER is incorrect as none of the site comprises prime agricultural land. Comprises of residential uses, agricultural buildings with hardstanding and a tarmacked car park.	Disagree. The entire site is on prime agricultural land and the use of a site does not affect its soil quality beneath it, as it is unlikely that all the soil has been removed. No action required.	Appendix 8.5.5
Clarendon Planning & Development Ltd on behalf of The Sluie Estate Trust	Site Assessment – Bid KN115	On cultural heritage, ER is incorrect as New Mains of Ury farmstead is not listed and recording could be undertaken if there is a need to demolish, but this has not yet been determined.	New Mains of Ury farmstead is listed as an archaeological site on the Sites and Monuments Record. This has been clarified in the ER.	Appendix 8.5.5
Clarendon Planning & Development Ltd on behalf of The Sluie Estate Trust	Site Assessment – Bid KN118	On material assets, no proposal to upgrade the B979 and the planning permissions at Ury Estate require that after opening the link road that the East Lodge junction is closed to through traffic.	The respondent is correct, but the proposal is likely to increase traffic on the A90/ AWPR junction, and land may be required to upgrade it. This has been highlighted in the ER.	Appendix 8.5.5
Clarendon Planning & Development Ltd	Site Assessment – Bid KN119	On water quality, ER is incorrect as Megray Burn was by-passed/ diverted west of the AWPR so no mitigation required.	This is noted and the ER has been amended, but there is a small ditch along the western boundary of the site	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
on behalf of The Sluie Estate Trust			and a buffer strip would be required.	
Clarendon Planning & Development Ltd on behalf of The Sluie Estate Trust	Site Assessment – Bid KN119	On landscape, ER is incorrect, as the Landscape Assessment confirms little impact on the ground that compromises the AWPR and junction interchange, which will be lit 24hrs.	Disagree. No action required. There is little light pollution due to modern lighting being used that only illuminates the road. The ER acknowledges strategic landscaping would reduce its impact, but it would be intensifying development where there is very little north of the AWPR.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN120	Effects on air quality can be mitigated by new walking and cycling routes, which should be reflected in the SEA.	Disagree. No action required. No links across the A90 to Stonehaven or upgrading existing routes are proposed.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN120	This site would have the least impact of all the bid sites around Stonehaven's landscape setting and would be seen within the same visual envelope as existing housing, creating a sense of continuity with the existing town.	No action required. Compared with other bids, Stonehaven's 'bowl' setting and the location of KN120 could reduce its visual impact when viewed from the north, but it would rise above existing tree line and it is disconnected from Stonehaven by the A90. It would have a negative impact on the landscape.	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN120	The biodiversity scoring should reflect the enhancement measures proposed to mitigate the impact on ancient woodland and biodiversity.	Disagree. The loss of established woodland will have a negative impact. Positive scores are only if existing habitats are enhanced. No action required.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN121	The climatic factors score in relation to flooding concerns should reflect the drainage solutions proposed to mitigate surface water issues in and around the site.	Disagree. Mitigation measures (i.e. a Flood Risk Assessment) is taken into account in the ER. Slightly negative impacts are due to carbon emissions. No action required.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN121	Effects on air quality can be mitigated by new walking and cycling routes, which should be reflected in the SEA.	No action required. It is accepted that the ER should reference the new link road across the A90(T), but given the scale of the proposal, some negative effects on air quality are likely so the post-mitigation score will remain as 0/-.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN121	Site KN121 would have the least impact of all the bid sites around Stonehaven's landscape setting and would be seen within the same visual envelope as existing housing, creating a sense of continuity with the existing town.	No action required. Compared with other bids, Stonehaven's 'bowl' setting and the location of KN121 could reduce its visual impact when viewed from the north, but it would rise	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			above existing tree line and it is disconnected from Stonehaven by the A90. It would still have a negative impact on the landscape.	
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN121	The biodiversity scoring should reflect the enhancement measures proposed to mitigate the impact on ancient woodland and biodiversity.	Disagree. The loss of established woodland will have a negative impact. Positive scores are only if existing habitats are enhanced. No action required.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN121	The climatic factors score in relation to flooding concerns should reflect the drainage solutions proposed to mitigate surface water issues in and around the site.	Disagree. Mitigation measures (i.e. a Flood Risk Assessment) is taken into account in the ER. Slightly negative impacts are due to carbon emissions. No action required.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN121	Disagrees with the negative score for material assets, particularly on local schools given there are preferred sites that would also affect education capacity.	Disagree. The preferred sites are not the same scale as this proposal, and the education issue will be less. No action required.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN121	Disagrees with the negative score for material assets, as economies of scale and overall settlement strategy should be considered, as the large the development the more there is an opportunity for a genuine mixed-use development, providing a range of services and facilities.	Disagree. Site scores negatively as no primary school is proposed for the scale of development and critical mass for new	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			facilities is uncertain. No action required.	
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN122	Regarding site KN122, effects on air quality can be mitigated by new walking and cycling routes, which should be reflected in the SEA.	It is accepted that the ER should reference the new link road across the A90(T), but given the scale of the proposal, some negative effects on air quality are likely so the post-mitigation score will remain as 0/-. No action require.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN122	Site KN122 would have the least impact of all the bid sites around Stonehaven's landscape setting and would be seen within the same visual envelope as existing housing, creating a sense of continuity with the existing town.	Disagree. The location of KN122 would rise above existing tree line and is disconnected from Stonehaven by the A90. It would still have a negative impact on the landscape. No action required.	Appendix 8.5.5
Halliday Fraser Munro on behalf of Barratt North Scotland	Site Assessment – Bid KN122	The biodiversity scoring should reflect the enhancement measures proposed to mitigate the impact on ancient woodland and biodiversity.	Disagree. The loss of established woodland will have a negative impact. Positive scores are only if existing habitats are enhanced. No action required.	Appendix 8.5.5
Halliday Fraser Munro on behalf	Site Assessment – Bid KN122	The climatic factors score in relation to flooding concerns should reflect the drainage solutions proposed to mitigate surface water issues in and around the site.	Disagree. No action required. Mitigation measures (i.e. a Flood Risk Assessment) is taken into	Appendix 8.5.5

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
of Barratt North Scotland			account in the ER. Slightly negative impacts are due to carbon emissions.	
Halliday Fraser Munro on behalf of Drum Property Group	Site Assessment – Bid KN123	SEPA flood maps do not indicate that site KN123 would be prone to flooding as suggested incorrectly in the MIR SEA.	No action required. The main assessment of bid KN123 does not state that it is at risk from flooding. However, a drain bisects the bid and surface water flooding is identified on land across the road.	Appendix 8.5.5
Historic Environment Scotland	Site Assessment – Bid KN129	On cultural heritage, SEA does not identify any impacts on Scheduled monument SM4892 (Cairn-mon-earn, cairn).	The Environmental Report and the full assessment have been updated. To mitigate effects, the Proposed Plan will state in the Settlement Statement for this site, "Any impacts on the adjacent scheduled monument, Cairn-mon-earn, cairn, will need to be investigated and mitigated."	Appendix 8.5.5
Historic Environment Scotland	Site Assessment – Bid KN138	On cultural heritage, welcome identification of impact on Scheduled monument Upper Balfour.	Noted. No action required.	Appendix 8.5.5
Shepherd and Wedderburn LLP	Site Assessment – Bid OP5 Alford	Does not agree with analysis of the SEA. It fails to recognise the negative impacts that site OP5 would have on landscape and cultural heritage. The significant adverse impacts on Balfluig Castle have not been acknowledged	Agree that potential impact on Category A listed Balfluig Castle should be acknowledged. However,	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
on behalf of Mr Mark Tennant		whilst the landscape and visual impacts it is claimed can be mitigated. There is no evidence given the topography and nature of development that anything other than significant effects would occur.	the score will remain as 0 as with its scale and location, proposed landscaping could mitigate, and therefore development is unlikely to adversely affect its setting.	
Historic Environment Scotland	Site Assessment – Bid MR015	On cultural heritage, welcome identification of potential significant impact on Category A listed Balfluig Castle.	Noted. No action required.	Appendix 8.5.6
Mr & Mrs Jean And Norman Abbot	Site Assessment – Bids MR017, MR018 and MR019	Disagrees with the landscape analysis that, while the site is located within the Dee Valley SLA the landscape experience is not likely to change significantly as the site is a logical extension of the settlement. It is difficult to understand how "landscape experience" would be unaffected by building 84 houses on a greenfield site. The Officers' conclusion that this would have a "neutral effect" having regard to reversibility or irreversibility (it would be irreversible) and duration (it would be permanent) appears contrary to a common sense understanding of the meaning of the word "neutral".	No action required. Agree there would be a significant negative affect and the pre-mitigation scores should be as such. However, the bids lie between two roads that have development on one side, and there is existing development adjacent to the river. The Dee Valley SLA Supplementary Guidance states in its Management Recommendations, "emphasis should be on maintaining the current patterns of land use and settlement, with development focused within existing towns and villages" and that design	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
			respects the vernacular heritage.	
Mr & Mrs Jean And Norman Abbot	Site Assessment – Bids MR017, MR018 and MR019	Agrees the on cultural heritage, that the development would have a "significant negative effect" within the conservation area, but disagree with mitigation as it would have an irreversible detrimental effect on the character of the village as a whole, and the archaeological site is in any event quite large. The second suggested measure is that the development should be "reflective of the conservation area", but it is not clear how it is envisaged that a new housing development in the particular location could possibly "reflect" the conservation area. The proposal would be contrary to the policies HE1.2 and HE2.1.	It is accepted that even with mitigation measures, the rural conservation area would be affected. The ER has been amended accordingly (-/--). However, LDP policies on design and historic environment, and SLA supplementary guidance requires the design of any development to respect the special qualities of a place.	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bids MR017, MR018 and MR019	The assessments underestimate the effects that a large-scale development would have on a small historic village and its surrounding Conservation Area. They appear contrary to the village Conservation Area Status and the Scottish Government and Aberdeenshire Council policies and guidance on the historic built environment.	It is accepted that even with mitigation measures, the conservation area would be affected. The ER has been amended accordingly (-/--).	Appendix 8.5.6
Mr Robert Farquharson	Site Assessment – Bids MR017, MR018 and MR019	Would represent a massive over development of what is still a small village. It would have significant negative effects on the character, landscape and cultural heritage of the village. It is, therefore, contrary to the village's conservation area status and against Scottish Government and Aberdeenshire Council Policies and Guidance on conservation and the built environment.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for these bids has been amended accordingly (-/--).	Appendix 8.5.6
Kincardine O'Neil Community	Site Assessment – Bids MR017,	The application of Scottish Government and Aberdeenshire Planning policies and guidelines appears to	It is accepted that even with mitigation measures,	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Association Committee	MR018, MR019, MR021, MR023 and MR057	be inconsistent for the assessment of sites in Kincardine O'Neil, in particular those relating to MR019, as it will have a significant negative impact on the special character and setting of Kincardine O'Neil and the Conservation Area.	the landscape and conservation area would be affected. The ER for MR017, MR018 and MR019 has been amended accordingly (-/--).	
Kincardine O'Neil Community Association Committee	Site Assessment – Bids MR017, MR018, MR019, MR021, MR023 and MR057	It is considered that small developments in the existing village envelope, such as the MR057 bid, would have a much smaller negative impact on the cultural heritage of the village than the MR019 bid.	Agree. The impact these bids would have on the conservation area have been reviewed. The post-mitigation score for MR057 has been changed to neutral as it is a small-scale development within the visual envelope of the settlement, and a soft boundary edge would further reduce its visual impact when approaching the settlement from the east.	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bids MR017, MR018, MR019, MR021, MR023 and MR057	There are perceived contradictions in some of the interim environmental statements.	Noted. The landscape and historic impact of these bids will be reviewed in light of comments received from SNH and the Council's Environment Planners.	Appendix 8.5.6
Mr Robert Farquharson	Site Assessment – Bids MR017, MR018, MR019,	SEA for Kincardine O'Neil highlights several topics where development bids will have serious long-term effects on the village but offers no real mitigation options. The idea	Noted. The landscape and historic impact of these bids will be reviewed in light of comments received from	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
	MR021, MR023 and MR057	that a development merges into a conservation area landscape is not mitigation.	SNH and the Council's Environment Planners.	
Mr Robert Farquharson	Site Assessment – Bids MR019 and MR057	The SEA is inconsistent. The proposed bid MR057 for 8 houses tucked away and out of sight behind the main village is, after mitigation, judged to still have a 'negative effect' on the historic character of the village. Whereas, the much larger bid MR019 (84 houses) in a more prominent position, next to the main routes into the village, will effect views of the historic village and listed buildings, and part of the site is on an archaeological site that, with mitigation, the development would produce a 'neutral effect'. This is blatantly incorrect and that the mitigation measures will not be sufficient to prevent significant detrimental effects on the character of the village, its surrounding conservation area. The SEA fails to ultimately reflect the negative effects which it outlines, it simply categorises all issues as 'neutral effect' post-mitigation. Mitigation or 'lessening the effects of' does not mean that there is no longer any impact. The report says there will be long term effects on some sites post-mitigation, yet this is not reflected in the report outcomes.	Noted. The landscape and historic impact of these bids will be reviewed in light of comments received from SNH and the Council's Environment Planners.	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR019	The mitigation measures would have very little mitigating effect and even with mitigation in place, the proposal would have a 'significant negative effect' on the landscape and cultural heritage of the village.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR019	MR019 would put a very large housing estate at the western end of the village and would be prominent and visible and have a high visual impact on the approach to the historic village. Development of this site would be against the aims of the conservation area. It would overwhelm the historic village, changing its character, integrity and setting.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR019	In the environmental assessment site MR019 it outlines several negative effects that development on this site would bring. However, the means of mitigation stated would not result in a 'neutral' effect post mitigation.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR019	The environmental assessment for site MR019, under 'Landscape', omits to say that the site is within the Kincardine O'Neil Conservation Area, but states 'The site is located within the Dee Valley Special Landscape Area...'	Landscape and historic impacts are considered separately. No action required.	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR019	The statement "the landscape experience is not likely to change significantly" is considered misrepresentative. Any development would have a significant visual impact on entering the village from the west. This will affect views of the Conservation Area and archaeological site as you approach the village on the A93 main road or by the Deeside Way long-distance path. The 'landscape experience' of site MR019 is currently one of farmland and views of an historic conservation village, including several listed buildings. It cannot be argued that the building of a	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		large housing development will in no way change this landscape; green fields and views are being replaced by housing. The means of mitigation stated would not result in a 'neutral' effect post mitigation.		
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR019	On 'Cultural Heritage' the proposed mitigation measure of reducing the allocation will not in itself protect the archaeological site; only the prevention of building around the archaeological site would achieve this. The means of mitigation stated would not result in a 'neutral' effect post mitigation.	It is accepted that even with mitigation measures, the historic assets would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR019	With regard to 'the sense of place and the identity of existing settlements', a reduction of allocation (i.e. number of houses) will have no effect on the area of the development (8.8 ha); there will still be a very significant change to the identity of this small 'historic' village and its sense of place in the landscape.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 will be amended accordingly (-/--).	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR019	The report's final 'Effect "post mitigation' column fails to reflect the negative effects outlined in the report, with all issues categorised as 'neutral effect' post-mitigation. Mitigation means 'lessening the effects of'; it does not mean that there is no longer any impact. There will still be an effect on the site post mitigation in most cases.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Kincardine O'Neil Community	Site Assessment – Bid MR019	On landscape, mitigation based on the statement 'over the long term, what gets developed becomes part of the landscape' (i.e. 'people will get used to it') cannot be	It is accepted that even with mitigation measures, the landscape would be	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Association Committee		interpreted as a zero or neutral effect post-mitigation. It is hard to construe that the proposed MR019 housing development will either preserve or enhance the character or appearance of the conservation area; both the character and appearance of the area, overall, will be changed long-term, whether or not people get used to it. As such it would be contrary to policy HE1.	affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR019	On landscape, 'the effects are only likely to have medium-term effects', confirms that the conservation area, archaeological site and surrounding area will be negatively impacted by development. The 'cultural heritage' reference to a 'long-term and permanent negative effect on the archaeological site', even with some mitigation, cannot warrant being classed as a long-term neutral effect.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Mr Robert Farquharson	Site Assessment – Bid MR019	Proposal will result in over development. The village is still becoming accustomed to the current large expansion so should not be expected to accept another huge development so soon.	Noted. It is proposed not to allocate any new residential sites in Kincardine O'Neil. No action required.	Appendix 8.5.6
Mr Robert Farquharson	Site Assessment – Bid MR019	A development of the size of MR019 in such a prominent position raised above the main route into the village can only harm the appearance, setting and character of the Village and the conservation area.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Mr Robert Farquharson	Site Assessment – Bid MR019	SEA of historic environment policies, specifically on conservation areas is merely given lip services and are not being used to enhance historic assets. The large	It is accepted that even with mitigation measures, the landscape and	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		development (MR019) in the conservation area will overwhelm the current village, obliterate views into and out from the conservation area, completely change the village's sense of place and detract from the setting of the many listed buildings.	conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	
Ms Susan Farquharson	Site Assessment – Bid MR019	Unsure how a change from agricultural countryside with its habitats and wildlife to mass housing can be considered as no significant change to the landscape experience. Inference that the community will get used to it does not equate to 'no change to the landscape'. No amount of mitigation could compensate for visual impact.	It is accepted that even with mitigation measures, the landscape would be affected. The ER for bids MR017, MR018 and MR019 Has been amended accordingly (-/--).	Appendix 8.5.6
Ms Susan Farquharson	Site Assessment – Bid MR019	The current developments do not meet strict criteria on character and material so there is no confidence in mitigation being that development is reflective of the conservation area.	It is accepted that even with mitigation measures, the conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Ms Susan Farquharson	Site Assessment – Bid MR019	Development will have a long-term and permanent negative effect on the archaeological site as per the SEA and therefore should not be built upon.	Noted. No action required.	Appendix 8.5.6
Mr & Mrs John & Catherine Nichols	Site Assessment – Bid MR019	The environmental report does not mention that the site is within the Kincardine O'Neil Conservation Area.	This is alluded to in the ER, but it has been amended.	Appendix 8.5.6
Mr & Mrs John & Catherine Nichols	Site Assessment – Bid MR019	The section of the Environmental Report that states that "the landscape experience is not likely to change significantly" is misrepresentative. The proposed development would have a significant visual impact when	It is accepted that even with mitigation measures, the landscape and conservation area would be	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		travelling Westwards, and would impact on the views of farmland and the historic conservation village, which includes several listed buildings.	affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	
Mr & Mrs John & Catherine Nichols	Site Assessment – Bid MR019	The ER on page 11 states "we will not build on areas that are prominent and visible places". The proposed site will clearly be prominent and visible from multiple places, including the primary vehicular routes into the village and the Deeside Way.	It is accepted that even with mitigation measures, the landscape would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Ms Lyndsay MacEwen	Site Assessment – Bid MR019	The environmental report for MR019 outlines several negative effects development on this site would bring. The 'Post Mitigation' column does not reflect the negative effects outlined identified.	It is accepted that even with mitigation measures, the landscape would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Ms Lyndsay MacEwen	Site Assessment – Bid MR019	Under Cultural Heritage, the ER states that the development will have long-term and permanent negative effect on the archaeological site contained within the development area and conservation area. The development may weaken the sense of place and the identity of existing settlements. The scoring on Cultural Heritage for "post mitigation" is incorrect and must be changed to 'negative effect' or 'significant negative effect'. SPP and LDP on conservation area states that proposed development that fails to preserve the character or appearance of the area should normally be	It is accepted that even with mitigation measures, the conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		refused planning permission. This policy was not adhered to for MR019.		
Ms Lyndsay MacEwen	Site Assessment – Bid MR019	It has not been mentioned that site MR019 is within the Kincardine O'Neil Conservation Area.	This is alluded to in the ER, but it has been amended.	Appendix 8.5.6
Ms Lyndsay MacEwen	Site Assessment – Bid MR019	<p>Landscape section on environmental report for MR019 states, "Landscape experience is not likely to change significantly" - the statement is totally misrepresentative, as any development would have an effect on views of the village, conservation area and archaeological site.</p> <p>The environmental report scores neutral at post mitigation column - objected to this and this cannot be construed as preserving or enhancing. The conservation area and archaeological site and surrounding area will be negatively impacted by the development. A long-term and permanent negative effect' even with some other mitigation cannot warrant being classed as a 'Neutral effect'. The scoring on Landscape for "post mitigation" is incorrect and must be changed to 'negative effect' or 'significant negative effect'.</p>	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Ms Lyndsay MacEwen	Site Assessment – Bid MR019	The mitigation required for MR019 is substantial and no evidence is given in the environmental report analysing that it can be achieved. Therefore, the site should not be "reserved" in the plan.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--). It is not proposed to allocate this site in the LDP.	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Mr Andrew Graham MacEwen	Site Assessment – Bid MR019	The statement "the landscape experience is not likely to change significantly as the site is a logical expansion to the settlement" is an absurd statement, given the proximity of the Deeside Way and the impact the development would have on the approach view coming from the west of the village. The following statement "what gets developed becomes part of the landscape" is not appropriate because of the negative impact from over-development of an historic village. Also, inadequate mitigation have been proposed to overcome the issues.	It is accepted that even with mitigation measures, the landscape and conservation area would be affected. The ER for bids MR017, MR018 and MR019 has been amended accordingly (-/--).	Appendix 8.5.6
Mr Robert Farquharson	Site Assessment – Bid MR019 & MR057	MR019, MR057: There is inconsistency in the way bids have been assessed with small sites having an effect on the conservations area whereas larger sites only have a neutral effect. The mitigation measures will not be sufficient to prevent significant detrimental effects on the conservation area.	Agree. The impact these bids would have on the conservation area have been reviewed. The post-mitigation score for MR057 has been changed to neutral as it is a small-scale development within the visual envelope of the settlement.	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR021	With regard to 'good connectivity', there is currently no pavement access to the site from the village. Given the distance, for many people, access from the village will be by car. Mitigation measures would be required to address this.	Agreed. A requirement for this site would be to provide a path to the settlement where possible. This is a matter for a planning application, should one be submitted.	Appendix 8.5.6
Mr Robert Farquharson	Site Assessment – Bid MR021	The overview of this proposed development says, 'The site would be an infill between the existing uses to both the east and west with good connectivity to the village'. This is	Noted. A requirement for this site could be to provide a path to the settlement	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		simply not the case; there is no pavement access to the site from the village so how can this be 'good connectivity'. To access the site from the village requires a walk across an often muddy playing field. To the west the site borders farmland so is not as described, an infill.	where possible. This would need to be confirmed with our Roads Colleagues. This is a matter for a planning application, should one be submitted.	
Mr Robert Farquharson	Site Assessment – Bid MR021	This development would in effect be ribbon development, creating an out of settlement retail development that may well cause harm to the retail establishments in the centre of the village. Planning policies and practice are against such developments with car only access, ribbon developments along main roads and out of town shopping developments.	Disagree. No action required. This bid is not ribbon development as it accessed from an existing separate road. The retail uses in the settlement have no protective designation (i.e. a town centre) and new uses can come forward under LDP policies. The proposal is adjacent to the settlement and proposed uses should be reflective of local demand.	Appendix 8.5.6
Historic Environment Scotland	Site Assessment – Bid MR022	On cultural heritage, agree that allocation would serve to protect important element of the setting of Category A listed Balfluig Castle.	Noted. No action required.	Appendix 8.5.6
Mr & Mrs Jean And Norman Abbot	Site Assessment – Bid MR023	Supports overall assessment of MR023 as having a significant negative effect on the grounds of adverse impact on biodiversity and loss of habitats.	Noted. No action required.	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Kincardine Estate Strutt & Parker	Site Assessment – Bid MR023	To address biodiversity enhancement of this 'not preferred' site, proposes compensatory tree planting (mixed species) immediately adjacent to site, and by restoring woodland strips and screening around site periphery, including screening of an existing woodland walk, biodiversity will be significantly improved from its current state.	No action required. The compensatory planting would be within Bartlemuir Wood, which is already identified as woodland and as such the planting would not be considered as compensatory.	Appendix 8.5.6
Kincardine Estate Strutt & Parker	Site Assessment – Bid MR023	To address biodiversity enhancement of this 'not preferred' site, on site protection, this should be viewed in context that 1) there is currently no standing commercial forestry on the[bid] site as this was clear felled; 2) the compensatory tree planting would be on adjacent land under former electricity line on area approx 1.7ha which is greater than the bid site area of 1.25 ha. See area outlined on attached plan; 3) this is not the only small parcel of woodland/potential woodland as the Estate currently holds approx 620 ha of land under forestry (over half of Estates total land area), and the new area will be mixed species rather than the monoculture in nearby commercial forestry.	No action required. The compensatory planting would be within Bartlemuir Wood, which is already identified as woodland and as such the planting would not be considered as compensatory.	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR023	Road access is poor as it is a single-track road without pavements, which passes residential houses.	Noted. No action required.	Appendix 8.5.6
Ms Susan Farquharson	Site Assessment – Bid MR023	Agree with environmental assessment that it is woodland and will have a long-term irreversible adverse impact on biodiversity through loss of habitats, fragmentation and disturbance to species.	Noted. No action required.	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Halliday Fraser Munro on behalf of W&W Mackie	Site Assessment – Bid MR032	The SEA reports that "development could have a long term negative impact due to the potential for increased travel requirements (the need to travel long distances to key services)", but it goes on to note that this is likely to have only a minor negative effect. Alford is not considered to be a long distance away.	Disagree. Alford is not within walking distance and effects are only minor negative. The bus service is intermittent. No action required.	Appendix 8.5.6
Halliday Fraser Munro on behalf of W&W Mackie	Site Assessment – Bid MR032	The SEA reports that the development is in an area "identified at risk from surface water flooding and is likely to have long term effect on climate and the water environment". However, the risk of surface water flooding is not identified on the SEPA flood map. This point should be clarified.	A small part of the southern edge of the site is at risk from surface water flooding. This has been clarified in the ER.	Appendix 8.5.6
Ms Kath Richards	Site Assessment – Bid MR038	Disagrees SEA biodiversity impact rating as '0'. SEA should have a '--' rating for impact due to the impact on the biodiversity of Loch of Leys Local Conservation Site. MR038 should be rated as per other comparable sites, such as MR062, as '- -'.	Disagree. No action required. The site is not covered in woodland and tree loss would be kept to a minimum, with compensatory planting, unlike MR062, which is mostly woodland.	Appendix 8.5.6
Ms Kath Richards	Site Assessment – Bid MR038	Disagrees SEA landscape impact rating as '0', and considers this should be rated as '- -' due to the extensive impact and the site being located in the Dee Valley SLA.	Partially agree. However, as the proposal is alongside the existing site OP2, which is under construction, it is unlikely to significantly alter the character of the immediate area. Therefore, the pre-mitigation landscape score has been changed to 0/-.	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Ms Kath Richards	Site Assessment – Bid MR038	Disagrees with the SEA statement of bid sites that replacing this landscape with new houses is only likely to have medium term effects over time, since the current small-scale field pattern, boundaries, woodland, etc will be lost forever.	Disagree. The site is not covered in woodland, and as it lies alongside site OP2, which is under construction, it is unlikely to significantly alter the character of the immediate area. However, the pre-mitigation landscape score will be changed to 0/- as the site is within a Special Landscape Area. The post-mitigation score will remain as '0'.	Appendix 8.5.6
Mr Andrew Richards	Site Assessment – Bid MR038	SEA has no post mitigation effect for MR038, whereas other sites around Banchory (e.g. MR062), result in a severe post mitigation effect.	No action required. Bid MR038 is not covered in woodland and tree loss would be kept to a minimum, unlike MR062, which is mostly woodland.	Appendix 8.5.6
Mr Andrew Richards	Site Assessment – Bid MR038	The landscape section is difficult to reconcile.	As bid MR038 lies alongside site OP2, which is under construction, it is unlikely to significantly alter the character of the immediate area. However, on review, the pre-mitigation landscape score has been changed to 0/-.	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Ms Jenny Smith	Site Assessment – Bids MR038 and MR039	Disagrees the mitigation measures (habitat and ecological survey, buffer strip and compensatory planting) would sufficiently mitigate the habitat and biodiversity loss from '--' to post mitigation '0'.	No action required. Bids MR038 and MR039 are not covered in woodland and tree loss would be kept to a minimum.	Appendix 8.5.6
Ms Jenny Smith	Site Assessment – Bids MR038 and MR039	Disagrees SEA rating against landscape experience. As noted, the landscape experience will change, but despite this the effect is rated as '0', it should be rated as negative for both pre- and post-mitigation.	As bid MR038 lies alongside site OP2, which is under construction, it is unlikely to significantly alter the character of the immediate area. However, the pre-mitigation landscape score has been changed to 0/- as the site is within a Special Landscape Area. The post-mitigation score will remain as '0'.	Appendix 8.5.6
Mr Mark Tasker	Site Assessment – Bids MR038 and MR039	The immense local value of the biodiversity within these sites has been missed in the SEA. Assessment should be double negative rather than 0. The same applies to assessment for landscape.	No action required. Bid MR038 is not covered in woodland and tree loss would be kept to a minimum.	Appendix 8.5.6
Historic Environment Scotland	Site Assessment – Bids MR042, MR043 and MR049	On cultural heritage, welcome identification of potential significant impact on Inventory of historic battlefields, Battle of Alford. Have specific concerns about MR042 as a non-preferred allocation given it is located in the vicinity of some of the areas of action/lines of battle. Significant cumulative between MR042, MR043 and MR049, which are located in the vicinity of some of the areas of action/lines of battle.	Noted. The cumulative impact of bids MR042, MR043 and MR049 have been noted in the ER.	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
Mr & Mrs Jean And Norman Abbot	Site Assessment – Bid MR057	MR057 does not appear to be mentioned in the SEA.	No action required. This bid was considered on page 540 in the Interim ER under 'Preferred sites'. It is on page 71 of the full bid assessment.	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR057	There does not appear to be an Environmental Report for MR057.	No action required. This bid was considered on page 540 in the Interim ER under 'Preferred sites'. It is on page 71 of the full bid assessment.	Appendix 8.5.6
Kincardine O'Neil Community Association Committee	Site Assessment – Bid MR057	Notes that as this site is behind housing, within the existing envelope of the village, the negative impact on the cultural heritage of the village is considered to be much less than that of MR019.	Agree. The impact these bids would have on the conservation area have been reviewed. The post-mitigation score for MR057 has been changed to neutral as it is a small-scale development within the visual envelope of the settlement, and a soft boundary edge would further reduce its visual impact when approaching the settlement from the east.	Appendix 8.5.6
Historic Environment Scotland	Site Assessment – Bids MR058 and MR071	On cultural heritage, SEA does not identify potential (visual) impact on Scheduled monument Tomnaverie,	Agree that bids MR058 and MR071 are likely to have a significant negative impact	Appendix 8.5.6

Organisation	Issue	Summary of Comments	Our Response	Section of Interim Environmental Report
		stone circle. Potential cumulative impacts between MR058 and MR071 should also be taken into account.	on the setting of the stone circle. Score post-mitigation has been changed from neutral to --/?, to reflect the options available. The cumulative impact of bids MR058 and MR071 has also been noted in the ER.	
Historic Environment Scotland	Site Assessment – Bid MR066	On cultural heritage, does not identify potential impact on Cat A listed Scott's Hospital	Agree that bid MR066 is likely to have a significant negative impact on the setting of the listed buildings, and given its location in a river valley, mitigation measure may be difficult. Score post-mitigation has been changed from neutral to --/?	Appendix 8.5.6

Table 5: Analysis of Comments from the Consultation Authorities and the Public on the Environmental Report 2020 for the Proposed LDP 2020

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Scottish Environment Protection Agency (SEPA) (PP1299 and PP1344)	General comments	It is welcomed that most of NatureScot's comments and recommendations have been incorporated into the revised ER and consequently the Proposed Aberdeenshire Local Development Plan (PLDP).	Noted. No action required.	All
SEPA (PP1299 and PP1344)	General comments	Has welcomed the inclusion of further mitigation measures and that many of these have been taken forward to the Proposed Plan.	Noted. No action required.	Appendices 8.6 and 8.7
SEPA (PP1299 and PP1344)	General comments	It is requested that the finalised ER is updated to include further mitigation measures, where identified in the Proposed Plan.	Agreed. The relevant tables have been updated to include mitigation measures, as appropriate, upon receipt of the Report of the Examination of the PLDP.	Appendices 8.6 and 8.7
NatureScot (PP1345)	General comments	NatureScot is satisfied with the Environmental Report, and appreciate the huge effort that has gone into preparing it and accommodating their previous comments.	Noted. No action required.	All
NatureScot (PP1345)	General comments	Their comments on the Habitats Regulations Appraisal (HRA) are likely to necessitate changes to the HRA Record and the SEA should be amended so that it is consistent with the HRA once revised.	Agreed that the SEA should be consistent with the finalised Habitats Regulations Appraisal (e.g. on River Dee and Ythan Estuary (geese)).	Appendices 8.6 and 8.7
Historic Environment	General comments	The Environmental Report sets out a thorough and considered assessment with an adequate level of	Noted. No action required.	All

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Scotland (PP1299)		detail and a clear narrative setting out its conclusions.		
Historic Environment Scotland (PP1299)	General comments	HES welcomed the alterations and additions made to the assessment contained on the appendices as they are in line with our previous advice.	Noted. No action required.	All
Formartine Rural Partnership (PP0884)	General comments	Observed that in the SEA, Footpaths, Cycleways, Active Travel Networks and Green corridors are widely included in the Environmental Report, which supports the LDP.	Noted. No action required.	Section 1.4, and Tables 1.1, 1.2, 1.3 and 1.5.
SEPA (PP1299 and PP1344)	Relationship with other Plans, Policies and Strategies (PPS)	They noted that all the PPS relevant to SEPA's interests, as listed in Appendix 8.3, have been considered in the ER.	Noted. No action required.	Appendix 8.3
SEPA (PP1299 and PP1344)	Relationship with other Plans, Policies and Strategies (PPS)	It is reported that Appendix 8.3 is incorrectly referenced as 8.2 in some of Table 8.2.2.	Agreed. Table 8.2.2 has been amended to refer to Appendix 8.3 where appropriate. Will also rename table to 8.2.1.	Table 8.2.2 (8.2.1)
Historic Environment Scotland (PP1299)	Relationship with other Plans, Policies and Strategies (PPS)	HES welcomed that Table 5.1 includes both Our Place in Time and the Historic Environment Policy for Scotland, but it has been mis-named as a Policy Statement in the text.	Agreed. Table 5.1 amended to correctly label Our Place in Time and the Historic Environment Policy for Scotland.	Table 5.1 and Appendix 8.3, Table 8.3.1
Historic Environment Scotland (PP1299)	Relationship with other Plans, Policies and Strategies (PPS)	HES suggested that Table 5.1 includes Gardens and Designed Landscapes, Historic Battlefields, and Setting, HES and PANs and their interim Guidance on Conservation Areas and the Principles of Listed Building Consent.	Agreed. HES publications: Gardens and Designed Landscapes, Historic Battlefields, and Setting, and their interim Guidance on Conservation Areas and the Principles of Listed	Table 5.1 and Appendix 8.3, Table 8.3.1

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			Building Consent added to Tables 5.1 and 8.3.1	
SEPA (PP1299 and PP1344)	Baseline information	It is welcomed that the Strategic Flood Risk Assessment (SFRA) was undertaken and are satisfied that this has adequately informed the site assessment process and the mitigation measures put forward.	Noted. No action required.	Appendix 8.4
SEPA (PP1299 and PP1344)	Baseline information	Has requested that comments on specific site flood risk assessments in the Proposed Plan are taken forward in the finalised ER.	Agreed. The ER has been updated to reflect the modifications recommended by the PLDP Reporter, which includes text on flood risk	Appendix 8.7
Historic Environment Scotland (PP1299)	Baseline information	Amend Appendix 8.4.10. Cultural heritage issues and constraints to state that asset types other than listed buildings can be enhanced in the planning process. Suggested referring to the value that historic assets can add to placemaking.	Agreed. Amended Appendix 8.4.10. Cultural heritage issues and constraints to identify that asset types other than listed buildings can be enhanced in the planning process and refer to the value that historic assets can add to placemaking.	Appendix 8.4.10
SEPA (PP1299 and PP1344)	Environmental Problems	Has welcomed that Table 5.3 includes the additional environmental problems they requested.	Noted. No action required.	Table 5.3
Historic Environment Scotland (PP1299)	Framework for Assessing Environmental Effects	HES welcomed that the methodology has been included in Appendix 8.5, but it should include a source of data for gardens and designed landscapes.	Agreed. Amended Appendix 8.5 to include, as a source of data. The Inventory of gardens and designed landscapes.	Appendix 8.5
Historic Environment	Framework for Assessing	HES has welcomed that the same methodology in Appendix 8.5 has been used for the assessment of all	It is too late to review the sites, but a note has been added to	Section 6.2 and Appendix 8.5

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Scotland (PP1299)	Environmental Effects	elements of the plan as this allows for greater consistency and clarity, but suggests in some areas the definitions for type of impact may not be broad enough (e.g. the wording does not cover impacts on intangible heritage very well, and this is often a factor in conclusions of the assessment).	section 6.2 on general issues, to broaden the definitions for type of impact, for example, impacts on intangible heritage.	
Historic Environment Scotland (PP1299)	Framework for Assessing Environmental Effects	HES is concerned that the values given in Appendix 8.5 are very specific and could be considered restrictive. For example, it is not possible for a setting impact to be considered as very negative, and negative effects do not include physical effects on sites or places other than conservation areas. They argued, this does not reflect the nuance given in the assessment or national policy in SPP, which gives equal weight to site and setting of scheduled monuments.	It is too late to review the sites, but a note has been added to section 6.2 on general issues noting HES request for the assessment methodology to be less specific and so less restrictive.	Section 6.2 and Appendix 8.5
Historic Environment Scotland (PP1299)	General difficulties, weakness and limitations	HES has welcomed the level of detail in paragraph 6.2, which sets out a thoughtful and reasonable consideration of the limitations of the assessment and welcomed this level of detail.	Noted. No action required.	Paragraph 6.2
Formartine Rural Partnership PP0884	Mitigation Measures	In Table 6.2, Page 63, Column 3, it is observed that "Developer contributions will be sought towards public transport, and roads infrastructure improvements to help mitigate the traffic impact". It does not include footpaths and cycleways	Agreed. Added paths for pedestrians, wheelers and cyclists to the fourth bullet point on developer contributions.	Table 6.2
SEPA (PP1299 and PP1344)	Mitigation Measures	It is noted and welcomed that most of SEPA's previous comments regarding mitigation measures have been incorporated into the ER and carried through to the Proposed Plan text.	Noted. No action required.	Table 6.2

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Historic Environment Scotland (PP1299)	Mitigation Measures	In Table 6.2, which sets out proposed mitigation, the wording implies that adverse effects on historic environment features may not be considered in their own right. Suggested clearer wording for the next SEA, to state that adverse impacts will be considered in terms of their impacts on the cultural significance of sites and places, through both physical and setting impacts.	Disagree. No action required. This statement refers to the consequence of development negatively affecting the historic environment, which could weaken the sense of place. However, the suggested wording is welcomed and should be added.	Table 6.2
Historic Environment Scotland (PP1299)	Mitigation Measures	HES noted that the mitigation measures in Table 6.2 are appropriate for impacts of the type identified, but the assessment identifies impact on issues such as sense of identity and place and these intangible effects may be harder to mitigate through the measures identified. As impacts of this type have often been identified as positive in the assessment, this has not had a direct effect on any of the outcomes of the assessment.	Noted. No action required.	Table 6.2
Historic Environment Scotland (PP1299)	Mitigation Measures	HES suggested Table 6.2 would benefit from a clear statement that negative impacts on cultural significance of assets will be considered and mitigated where possible.	Agreed. Amended Table 6.2 to provide a clear statement that negative impacts on cultural significance of assets will be considered and mitigated where possible.	Table 6.2
SEPA (PP1299 and PP1344)	Monitoring Framework	Has no further comment to make on the monitoring framework.	Noted. No action required.	
Historic Environment	Monitoring Framework	HES noted that Table 6.3 sets out the Monitoring Plan for the LDP, but it does not reflect all of the considerations that went into the Monitoring Report	Noted, but not all the LDP monitoring data is relevant to the SEA and vice versa.	Table 6.3

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Scotland (PP1299)		and suggests it would be more accurate for the two to align better.		
SEPA (PP1299 and PP1344)	Next Steps	Has no further comments to make in this respect.	Noted. No action required.	
Historic Environment Scotland (PP1299)	Spatial strategy	HES suggested para 8.6.2, on the assessment of the spatial strategy, should consider the positives of identifying the need for masterplanning and further assessment at project level, as well as the opportunities the plan gives for allocating sites that will allow regeneration of historic assets.	Partially agree. While the spatial strategy section provides a broad overview of new development across Aberdeenshire, SEA Topics on climatic factors, biodiversity and cultural heritage have been amended to refer masterplans and further assessments as a means to mitigate possible effects.	Appendix 8.6, Table 8.6.2
Historic Environment Scotland (PP1299)	Spatial strategy	HES is not seeking any changes to the spatial strategy, but have focussed on the newly allocated preferred sites. Comments on the full suite of sites were given in their response to the Main Issues Report and should be referred to for non-preferred options. They have not identified any significant adverse effects for HES interests.	Noted. No action required.	
SEPA (PP1299 and PP1344)	Sites and Policies Assessment – Mitigation Measures	SEPA welcomed the inclusion of further mitigation measures and see that many of these have been taken forward to the Proposed Plan.	Noted. No action required.	Appendix 8.7
SEPA (PP1299 and PP1344)	Sites and Policies Assessment –	SEPA requested that the justification for the mitigation measures they require for each allocation is included in the finalised ER where they are not	Agreed. Noted where mitigation measures such as flood risk assessments are	Appendix 8.7

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
	Mitigation Measures	already included. SEPA highlighted that their proposed mitigation measures are necessary to ensure the impacts of development of the sites are minimised as well as possible. This should include the policies.	required for development sites, they are highlighted in the ER.	
NatureScot (PP1300 and PP1345)	Sites Assessment - scoring	Requested that for allocations where they have made representations to address landscape and visual impacts, the score for Landscape in the Environmental Report should be changed from neutral to '+/-', where relevant.	Agreed. These sites have been reviewed and neutral scores changed to mix with reasons added.	
Historic Environment Scotland (PP1299)	Policy Assessment	HES agreed that policies that protect landscape have the potential to benefit the historic environment and would consider this particularly in light of the fact that we consider that all landscapes have both natural and cultural elements as set out in People, Place and Landscape, our joint position statement with SNH.	Noted. No action required.	Appendix 8.6, Paragraph 8.6.3
Historic Environment Scotland (PP1299)	Policy Assessment	HES provided an appendix of their comments on the Proposed Plan, known as Annex 1.	Noted. No action required.	Appendix 8.6
Historic Environment Scotland (PP1299)	Policy Assessment: Policy HE3 Helping to Reuse Historic Buildings at Risk	HES welcomed the changes made to policy HE3 and consider that these have made the policy more positive in its effects than its previous iteration. The narrative for this assessment states that enabling development must be on an adjacent site and this does not reflect the wording of the policy, which is more nuanced, and which we consider more effective.	Agree. The overview text has been amended to reflect the policy.	Appendix 8.6, Table 8.6.27

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Historic Environment Scotland (PP1299)	Policy Assessment: Policy PR2 Reserving and Protecting Important Development Sites	HES disagreed that policy PR2 would have a very negative effect on cultural heritage as it does not in itself allocate for development but rather stops other development on safeguarded sites. It is not clear how this could in itself have significant effects.	We agree that this policy does not state, 'We will allow development on protected sites as stated in the Settlement Statements', like other policies (e.g. Policy B2). However, as this policy indirectly supports in principle the uses specified in Policy PR2, it could have consequential negative impacts. This will be stated in the introductory text in the ER. No action required.	Appendix 8.6, Table 8.6.29
Historic Environment Scotland (PP1299)	Policy Assessment: Policy C2 Renewable Energy	HES noted that Policy C2 assesses wind development as temporary and that this does not reflect the wording of SPP, which states that wind farm sites should be suitable for use in perpetuity. For this to be assessed impacts should be considered permanent.	Partially agree. Text has been added to state, "...unless consent is sought to repower them." as non-operational wind turbines should be removed.	Appendix 8.6, Table 8.6.32
Formartine Rural Partnership PP0884	Policy Assessment: Policy RD2	In Table 6.2, Page 63, Column 3, it is observed that "Developer contributions will be sought towards public transport, and roads infrastructure improvements to help mitigate the traffic impact". It does not include footpaths and cycleways	This is a passing observation. They have commented elsewhere. No action required.	
SEPA (PP1299 and PP1344)	Site Assessment – Banff and Buchan – Banff R1	SEPA support the assessment for site R1 with regards to its impact on groundwater.	Noted. No action required.	Appendix 8.7, Table 8.7.1
SEPA (PP1299 and PP1344)	Site Assessment – Banff and Buchan –	They have welcomed the assessment for site OP1 in relation to soil factors.	Noted. No action required.	Appendix 8.7, Table 8.7.1

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
	Cairnbulg and Inverallochy – OP1			
Historic Environment Scotland (PP1299, PP1343)	Site Assessment – Banff and Buchan – Ladysbridge – OP1	HES noted that site OP1 in Ladysbridge is located approximately 500m NW of the scheduled monument known as Hills of Boyndie, barrows & enclosures 700m SW of Mill of Boyndie, but HES is content that the proposed development will not significantly impact on its setting.	Updated assessment of OP1 to note that the site is 500m NW of Hills of Boyndie, barrows and enclosures scheduled monument and 700m SW of Mill of Boyndie (SM 5779), which are visible as cropmarks, and it is situated in an elevated position on the Hill of Boyndie. However, given the location of the proposed housing allocation among existing settlement and the distance to the monument, the proposed development will not significantly impact on its setting.	Appendix 8.7, Table 8.7.1 and Banff and Buchan Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Banff and Buchan – Memsie R1	This site is missing from the Assessment of the Proposed Sites and Table 8.7.1.	Added site Memsie R1 to the Assessment of the Proposed Sites and Table 8.7.1.	Appendix 8.7, Table 8.7.1 and Banff and Buchan Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Banff and Buchan – Memsie OP2	Has requested that the text in the 'Comments and mitigation measures' column of Table 8.7.1 is revised to reflect that any future development on the north side of Memsie 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	Agree. Revised text in the 'Comments and mitigation measures' column of Table 8.7.1 to reflect SEPA's comments on OP2 in Memsie in their Proposed Plan response.	Appendix 8.7, Table 8.7.1 and Banff and Buchan Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		treatment (see detailed comments to the Proposed Plan).		
SEPA (PP1299 and PP1344)	Site Assessment – Banff and Buchan – Rathen R1	If this site is included before any groundwater assessment is undertaken, SEPA has requested amending the score in Table 8.7.1 Water column to - /?.	Agreed. Changed the Water score for site R1 to -/?.	Appendix 8.7, Table 8.7.1 and Banff
SEPA (PP1299 and PP1344)	Site Assessment – Banff and Buchan – Rathen R1	If this site is included before any groundwater assessment is undertaken, SEPA has requested amending the Comments and mitigation measures to, “Due to close proximity and likely hydraulic connectivity of the cemetery site to the nearby watercourses, without a detailed groundwater assessment, the environmental impact on water factors are unknown.”	Agreed. Amended the “Comments and mitigation measures” to “Likely to have an adverse effect on soil and landscape but the effects unlikely to be significant. Due to the underlying geology and the presence of a private water supply, without a detailed groundwater assessment, the environmental impact on water factors are unknown.”	Appendix 8.7, Table 8.7.1
Historic Environment Scotland (PP1299, PP1343)	Site Assessment – Banff and Buchan – Rathen OP1	This site is located approximately 140m W of the scheduled monument known as St Ethernan's, Rathen old parish church, but HES is content that the potential impact on the setting of the monument is unlikely to be significant.	Updated assessment of site OP1 to note that the site is 140m west of St Ethernan's, Rathen old parish church (SM 5810), a late medieval church and scheduled monument, and while screened by trees, even if felled, the potential impact on the setting of the monument is unlikely to be significant.	Appendix 8.7, Table 8.7.1

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
SEPA (PP1299 and PP1344)	Site Assessment – Buchan – Auchnagatt OP1	This site is at significant risk from flooding. SEPA will only support the assessment score for Climatic Factors in Table 8.7.2 if their requested mitigation measures (in the allocation summary) are undertaken. If not, the score for Climatic Factors should be - -.	No action required. SEPA's proposed mitigation measures for site OP1 were agreed by the Reporter at the LDP Examination.	Appendix 8.7, Table 8.7.2
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Buchan – Boddam OP1	HES noted that this site is located approximately 50m N of the scheduled monument known as Boddam Castle, but HES is content that some additional houses in this location of a similar scale/height to those which have already been built, are unlikely to significantly impact on its setting.	Updated assessment of site OP1 to note that the site is near Boddam Castle with views over the surrounding landscape and coast, and views towards the monument form parts of its setting. However, additional homes of a similar scale/height to existing are unlikely to significantly impact on its setting.	Appendix 8.7, Table 8.7.2
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Buchan – Fetterangus OP2	Fetterangus OP2 is located approximately 215m E of the scheduled monuments known as Fetterangus Church (SM 7143) and Fetterangus Church, symbol stone, and as the allocation would bring housing development closer to the monuments and has the potential to impact on their setting, consideration should be given to mitigating the impact through sensitive housing design and potentially also landscaping, such as using trees in the western section of the allocation to screen the development from view, in line with HES Setting guidance.	Updated the SEA, as this was agreed by the Reporter, to state, "The site is located approximately 215m east of two scheduled monuments, the medieval Fetterangus Church (SM 7143) and a Pictish symbol stone (SM 71). The monuments are presently surrounded within an open landscape, which gives them a strong sense of place and are set apart from settlement. The allocation would bring housing closer to the monuments and has the	Appendix 8.7, Table 8.7.2

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			potential to impact on their setting. To mitigate the impact, new development, through its siting and design, must be sensitive to its surroundings and incorporate landscaping at its western boundary to screen the development from view, in line with HES's Setting guidance. Historic Environment Scotland should be consulted at an early stage in the preparation of development proposals for the site".	
William Buchan PP0330	Site Assessment – Buchan – Longside OP1	Clarity is sought as to why SEA states development of 50 homes, whereas 30 homes are allocated in Proposed Plan.	There is an error in the Buchan Annex full assessment. The number of homes is stated as 30 in Table 8.7.2 of the Environmental Report. The Annex has been corrected.	Appendix 8.7, Table 8.7.2 and Buchan Annex of the full assessment
William Buchan PP0330	Site Assessment – Buchan – Longside OP1	Under SEA Topic 'Climatic Factors', insufficient consideration has been given to the effects on local hydrology in an already flood prone site. Argued the southern part of the field floods regularly and has poor drainage.	Disagree. The flood risk is noted in the SEA and given it is on the edge of the site, we would expect this area to form part of the site's open space contribution and remain undeveloped, depending on the Flood Risk Assessment (FRA). As such, a neutral score is deemed appropriate.	Appendix 8.7, Table 8.7.2 and Buchan Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
William Buchan PP0330	Site Assessment – Buchan – Longside OP1	Under SEA Topic 'Biodiversity', the impact should be 'significant with long term irreversible adverse impacts'. Argued there are protected species on the site (bats) and 'birds of conservation concern' as identified by the RSPB. Mitigations such as 'buffer strip' would take decades to provide a replacement habitat.	Disagree. The site is currently a field. Open space would be expected on the site, which would be expected to link with the path to the south of the site.	Appendix 8.7, Table 8.7.2 and Buchan Annex of the full assessment
William Buchan PP0330	Site Assessment – Buchan – Longside OP1	Reassess the landscape impact as the site rises West to East, and a substantially raised historic railway embankment to the southern boundary.	Disagree. The site rises gently. The scale and location of the farm steading complex will help to contain this site. In addition, most of the allocation is away from former railway line.	Appendix 8.7, Table 8.7.2 and Buchan Annex of the full assessment
Charlies and Jane Leslie PP0333	Site Assessment – Buchan – Longside OP1	They have reported inconsistencies between the Proposed Plan that states site OP1 is allocated for 30 units, but the SEA says 50 homes.	There is an error in the Buchan Annex full assessment. The number of homes is stated as 30 in Table 8.7.2 of the Environmental Report. The Annex has been corrected.	Appendix 8.7, Table 8.7.2 and Buchan Annex of the full assessment
Charlies and Jane Leslie PP0333	Site Assessment – Buchan – Longside OP1	Insufficient consideration has been given to the effects of local hydrology on the OP1 site in Longside. The southern part of the site floods regularly and there is poor drainage. The field is also bounded by a substantial embankment	Disagree. The flood risk is noted in the SEA and given it is on the edge of the site, we would expect this area to form part of the site's open space contribution and remain undeveloped, depending on the Flood Risk Assessment (FRA). As such, a neutral score is deemed appropriate.	Appendix 8.7, Table 8.7.2 and Buchan Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Charlies and Jane Leslie PP0333	Site Assessment – Buchan – Longside OP1	It is noted that the site will have a significant long-term adverse impact on biodiversity. Bats and bird species (birds of conservation concern by the RSPB) have also been seen on the site. Mitigations such as buffer strips would take decades to come into effect as a replacement habitat.	Disagree. The site is currently a field. Open space would be expected on the site, which would be expected to link with the path to the south of the site.	Appendix 8.7, Table 8.7.2 and Buchan Annex of the full assessment
Charlies and Jane Leslie PP0333	Site Assessment – Buchan – Longside OP1	The statement that the site is flat is not true as the site is on the rise from the West to the East and there is also a substantial raised historic railway embankment to the southern boundary of the proposed site.	Disagree. The site rises gently. The scale and location of the farm steading complex will help to contain this site. In addition, most of the allocation is away from former railway line.	Appendix 8.7, Table 8.7.2 and Buchan Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Buchan – Longside Airfield OP1	As this site was a former military airfield, it requires specialist assessments to inform appropriate mitigation. Therefore it is requested that in Table 8.7.2 the score for Soil is amended to 0/?.	Agreed. Amended post mitigation effects soil score to 0/? .	Appendix 8.7, Table 8.7.2
SEPA (PP1299 and PP1344)	Site Assessment – Buchan – Longside Airfield OP1	As this site was a former military airfield, it requires specialist assessments to inform appropriate mitigation. Therefore, it is requested that in Table 8.7.2 add the following to the Comments and mitigation measures, "Mitigations include specialist investigation for contamination due to former airfield use."	Agree. Amended the "Comments and mitigation measures" to "Mitigations include specialist investigation for contamination due to former airfield use."	Appendix 8.7, Table 8.7.2
SEPA (PP1299 and PP1344)	Site Assessment – Buchan – Old Deer R1	If this site is included before any groundwater assessment is undertaken, SEPA has requested amending the score in Table 8.7.2 Water column to - /?	Agreed. Changed the Water score for site R1 to -/?.	Appendix 8.7, Table 8.7.2

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
SEPA (PP1299 and PP1344)	Site Assessment – Buchan – Old Deer R1	If this site is included before any groundwater assessment is undertaken, SEPA has requested amending the Comments and mitigation measures to, "Likely to have an adverse effect on soil and landscape but the effects unlikely to be significant. Due to the underlying geology and the presence of a private water supply, without a detailed groundwater assessment, the environmental impact on water factors are unknown."	Agreed. Amended the "Comments and mitigation measures" to "Likely to have an adverse effect on soil and landscape but the effects unlikely to be significant. Due to the underlying geology and the presence of a private water supply, without a detailed groundwater assessment, the environmental impact on water factors are unknown."	Appendix 8.7, Table 8.7.2
SEPA (PP1299 and PP1344)	Site Assessment – Buchan – Peterhead OP6	This site is at significant risk from flooding. SEPA will only support the assessment score for Climatic Factors in Table 8.7.2 if their requested mitigation measures (in the allocation summary) are undertaken. If not, the score for Climatic Factors should be significantly negative.	Noted. The need for a flood risk assessment is highlighted in the LDP. As such the post mitigation score will not be significantly negative.	Appendix 8.7, Table 8.7.2
C a s e CONSULTING Ltd PP1096	Site Assessment – Formartine – Balmedie FR022	Argued that the assessments of the bids around Balmedie have not applied the criteria consistency, and bid FR022 should be allocated for a mixed use development.	Disagree. A universal methodology was applied, as agreed in the Scoping Report. No change required.	Appendix 8.7, Table 8.7.2
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Formartine – Ellon OP1	HES welcomed the revised boundary for Ellon OP1, which now excludes the A listed Old Bridge and its immediate setting and support the need for strategic landscaping and associated flood risk management.	Noted. No change required.	Appendix 8.7, Table 8.7.3
Carol Wright PP1136	Site Assessment – Formartine – Ellon OP1	Asked to clarify why woodland on south side of the site has not been referenced. The assessment states no impact on woodland to the north, northwest with no mention of the woodland on the south at	Disagree. The full assessment in the Annex states that "Mitigation measures, such as a buffer strip next to an area of woodland or	Appendix 8.7, Table 8.7.3 and Formartine Annex

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		Schoolhill Road, which is a continuation of the woodland area on the northwest site.	water course would reduce potential negative effects and provide biodiversity enhancement opportunities. This provides opportunity to enhance green networks." No change required.	of the full assessment
Nicole Allan PP1025	Site Assessment – Formartine – Foveran OP1 and OP2	Prioritise developments sites OP1 and OP2 over OP3 and OP4. SEA for new sites (pg. 53) states 'school roll is low, and new housing would help sustain Foveran Primary School' but the school role forecast (Aberdeenshire Council, 2019) and settlement statement states 'Primary education may be a constraint to development as the current school is not easily extendable due to the condition of the building and topographical restrictions'. A new school is needed in the area and should be completed before any new housing is accepted.	Noted, but as the small scale of this site is unlikely to adversely affect the existing school, no change to the score is required. No change required.	Appendix 8.7 and Table 8.7.3
Ian Ross PP1234	Site Assessment – Formartine – Foveran OP2 / FR109	Disagree with the assessment of FR109 in the SEA, they highlight the following: Site would not impact significantly air quality and appropriate measures could be put in place; Not aware of surface water hotspots, not at risk of flooding as shown on SEPA's 1 in 200 year map and no FRA required; All developments likely to result in increased traffic and landscape change; A small area of prime agricultural land would be lost, however precedent has been set by other sites in the settlement; Aware of a project to upgrade the waste water capacity; Substitution of part of FR109 in place of OP2 would not exacerbate capacity issues in primary school;	Site FR109 was not supported by the Reporter, but with the development of the new A90 trunk road, it has split this site in two. Amended: <ul style="list-style-type: none"> • Post mitigation scores for water to -/? As waste water could be mitigated. • Under Water, changed "Surface water drainage hotspots are scattered in some parts of the site." to "Site includes ditches and 	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		Mix of housing could be delivered; Coalescence would not occur with Rashierieve Foveran.	<p>small areas of surface water flooding."</p> <ul style="list-style-type: none"> Under Climatic Factors, amended 2nd bullet point on flooding to "Part of the site contains a watercourse and a small area is at risk from flooding, which could have a long-term effect on climate and the water environment. A Flood Risk Assessment may be required to mitigate potential effects." <p>Around half this site is prime agricultural land. Loss of this resource is acceptable to fulfil strategic housing requirement, where required. No further changes are supported.</p>	
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Formartine – Fyvie OP1	HES noted that this site is located within the Battle of Fyvie Inventory historic battlefield boundary of 1644. HES note that while the potential impact on any archaeological remains dating to the battle is likely to be low, this potential impact on the special qualities of the battlefield should still be assessed further. HES is content that any significant impacts on the understanding and appreciation of the battlefield landscape are unlikely, but any potential impacts on key landscape characteristics and the cumulative impacts should still be assessed, with	Updated assessment of site OP1 to note that it is located within the Battle of Fyvie Inventory historic battlefield boundary (BLT 22) of 1644, which has surviving field fortifications. The housing allocation would be within the SW part of the Inventory boundary, which is not presently considered to have been a key area of battlefield activity. For site OP1, any potential impacts on key landscape	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		mitigation and enhancement considered in line with HES Battlefield guidance.	characteristics and the cumulative impacts should be assessed, with mitigation and enhancement considered in line with HES Battlefield guidance.	
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Formartine – Oldmeldrum OP2	HES noted that this site is located within the Battle of Barra Inventory historic battlefield boundary of 1308, and while the potential impact on any archaeological remains dating to the battle are likely to be low, this potential impact on the special qualities of the battlefield should still be assessed further. HES is content that any significant impacts on the understanding and appreciation of the battlefield landscape is unlikely, but any potential impacts on key landscape characteristics and the cumulative impacts should still be assessed, with mitigation and enhancement considered, in line with HES Battlefield guidance.	Updated assessment of site OP2 to state that it is located within the Battle of Barra Inventory historic battlefield boundary (BLT 18) of 1308, which was one of many fought by Robert the Bruce. It is significant as it marks the end of any coordinated opposition to him in Scotland. Most of this allocation would be outwith the Inventory boundary. Any potential impacts on key landscape characteristics and the cumulative impacts should be assessed, with mitigation and enhancement considered, in line with HES Battlefield guidance.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Formartine – Oldmeldrum OP5	Has requested that an additional mitigation measure is added to the 'Comments and mitigation measures' column of Table 8.7.3 to require a Peat Survey, as the site is underlain by peat.	Agree. Added an additional mitigation measure to the 'Comments and mitigation measures' column of Table 8.7.3 for site OP5 that requires developers to provide a Peat Survey.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
SEPA (PP1299 and PP1344)	Site Assessment – Formartine – Oldmeldrum R1	Has requested that an additional mitigation measure is added to the 'Comments and mitigation measures' column of Table 8.7.3 to require a Peat Survey, as the site is underlain by peat.	Agree. Added an additional mitigation measure to the 'Comments and mitigation measures' column of Table 8.7.3 for site R1 that requires developers to provide a Peat Survey. Change soil score to 0/-	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Historic Environment Scotland (PP1299)	Site Assessment – Formartine – Pitmedden OP2	HES welcomed the revised boundary for this site, which reduces the site area and moves its west boundary further away from the historic landscape setting of the A listed Udney Castle, but while this would help mitigate potential adverse impact on the setting of Udney Castle, appropriate measures must be included to maintain the existing South-East to North-West linear tree belt.	Updated assessment of site OP2 to reflect that the Reporter reduced the site to exclude bid site FR006 (now only includes FR007) as that it is now further away from the historic landscape setting of the A listed Udney Castle. To mitigate potential adverse impact on the setting of Udney Castle, appropriate measures must be included to maintain the existing South-East to North-West linear tree belt.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Formartine – Pitmedden OP3	This site is at significant risk from flooding. SEPA will only support the assessment score for Climatic Factors in Table 8.7.2 if their requested mitigation measures (in the allocation summary) are undertaken. If not, the score for Climatic Factors should be significantly negative.	No change required. SEPA's proposed mitigation measures for site OP3 have been added to the LDP (a flood risk assessment and buffer strip will be required).	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Formartine – Pitmedden R1	This site is at significant risk from flooding. SEPA will only support the assessment score for Climatic Factors in Table 8.7.2 if their requested mitigation	No change required. SEPA's proposed mitigation measures for site R1 have been added to	Appendix 8.7, Table 8.7.3

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		measures (in the allocation summary) are undertaken. If not, the score for Climatic Factors should be significantly negative.	the LDP (a flood risk assessment and buffer strip will be required).	
Gordon Burgess PP0144	Site Assessment – Formartine – Potterton OP1	Has raised concern about the omission of information relating biodiversity and states that the sites are in proximity to qualifying sites and likely to impact on qualifying and protected species.	<p>It is accepted that the Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are not mentioned, whereas they are for other sites, and they should be acknowledged. However, in light of NatureScot's comments on the Habitats Regulation Appraisal, they state that impact the allocations are not likely to have an adverse effect in the integrity for any goose SPAs in relation to on geese foraging. Likewise, increased recreational disturbance to SPAs are likely to have no adverse effect on their integrity.</p> <p>Amended SEA Biodiversity topic for this site (and other sites), to state, "The Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are located to the north of this site. However, this site is not likely to have an adverse effect on the integrity of geese in terms of them foraging for food on fields.</p>	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			Likewise, increased recreational disturbance to SPAs are likely to have no adverse effect on their integrity." Change positive pre mitigation score to neutral.	
Stephen Nicol PP0209	Site Assessment – Formartine – Potterton OP1	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Jennifer Nicol PP0210	Site Assessment – Formartine – Potterton OP1	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Jamie Black PP0212	Site Assessment – Formartine – Potterton OP1	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Doranne Dawson PP0231	Site Assessment – Formartine – Potterton OP1	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Graeme Dawson PP0232	Site Assessment – Formartine – Potterton OP1	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Kerry Robertson PP0361	Site Assessment – Formartine – Potterton OP1	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Aaron Dobby PP0527	Site Assessment – Formartine – Potterton OP1	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Kerry Dobby PP0528	Site Assessment – Formartine – Potterton OP1	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Craig Leslie PP0645	Site Assessment – Formartine – Potterton OP1	The assessment for 'landscape' does not justify the post mitigation effect as 'neutral'. Has requested a review of the post mitigation landscape impact.	Disagree. It is accepted that there will be a negative impact on this site initially. However, given houses already exist between the two minor roads, and the green belt is a tool for	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			managing growth, the neutral impact is justified.	
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP1	The SEA does not provide necessary assurance of meeting SPP and SEA guidance from 30/8/2013. The site should be removed until such time the identified issues have been resolved for potential inclusion in the future.	Disagree. The Scoping Report set out the proposed methodology for assessing all bid sites, and was agreed by the SEA Consultation Authorities. All issues will be considered at the planning application stage. However, at present, the principle of developing on this site has been accepted, and likely mitigation measures highlighted.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP1	Has argued that many of the SEA assessments of effects are not justified. Specifically, the SEA does not make key findings clear, has failed to identify important environmental issues early, and appears to use the SEA to defend the Plan. The site should be removed until such time the identified issues have been resolved for potential inclusion in the future.	Disagree. The Scoping Report set out the proposed methodology for assessing all bid sites, and was agreed by the SEA Consultation Authorities. All issues will be considered at the planning application stage. However, at present, the principle of developing on this site has been accepted, and likely mitigation measures highlighted.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP1	Has argued that many of the SEA assessments are not sufficiently clear and complete to enable informed judgements to be made by consultees on the proposed development. Specifically, the SEA	Disagree. The Scoping Report set out the proposed methodology for assessing all bid sites, and was agreed by the	Appendix 8.7, Table 8.7.3 and Formartine Annex

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		does not make key findings clear, has failed to identify important environmental issues early, and appears to use the SEA to defend the Plan. Considers that sites OP1 and OP2 should be removed from the PLDP, until such time the identified issues have been resolved for potential inclusion in the future.	SEA Consultation Authorities. All issues will be considered at the planning application stage. However, at present, the principle of developing on this site has been accepted, and likely mitigation measures highlighted.	of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP1	The SEA has not adequately considered impact on biodiversity.	Disagree. Mitigation measures have been identified (a buffer strip next to existing woodland). Further mitigation measures would be more appropriately addressed at the planning application stage. The SEA did not identify issues that would prevent the principle of development on the site.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP1	The SEA has not adequately considered impact on climatic factors.	The score for climate factors as - /0 post mitigation is sound. However, the SEA has been amended to state “However, electric vehicles, and increased critical mass (customers) of public transport and local services will reduce the proposals potential impact.”	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP1	The SEA has not adequately considered impact on landscape.	Disagree. It is accepted that there will be a negative impact on this site initially. However,	Appendix 8.7, Table 8.7.3 and Formartine Annex

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			given houses already exist between the two minor roads, and the green belt is a tool for managing growth, the neutral impact is justified.	of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP1	The SEA has not adequately considered impact on material assets.	Disagree. Any adverse impact to local infrastructure must be mitigated before development can proceed. Any issues on education and roads will be investigated at the planning application stage. No change is required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP1	The SEA has not adequately considered impact on cultural heritage.	Partially agree. Amended effect to '- -' and post mitigation effect to '-/?'. Change first bullet point to, "Development would result in the loss of rig and furrow cropmarks. The impact would be permanent and irreversible. Investigations into archaeology would be required to be carried out."	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP1	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Air' Effect from 0 (Neutral) to – (Negative) and replace wording in comments section to read 'proposal of this scale will lead to a significant decrease in air quality (i.e.	Disagree. While the increase in emissions is likely, it will not be significant, as its scale and location will not decrease air quality in Ellon or Aberdeen. Use of electric vehicles and public	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		through increases in concentrations of air - pollutants) Effects are likely to be medium/long-term'.	transport will also mitigate effects. No change required.	
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP1	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. A Flood Risk Assessment, Water Impact Assessment and Drainage Impact Assessment will be required, and this has not been mentioned in the SEA in the PLDP. Amend SEA Topic 'Water' Effect from 0 (Neutral) to - - (Significant Negative) effect and add the following wording into the comments section 'The proposal is likely to have a significant negative effect as it will exceed public sewage treatment capacity in the area. Effects are likely to be localised and long-term, however the negative impacts could be mitigated through developer obligations and a Scottish Water growth project.', 'There is a significant existing surface water flood risk. The site is in a 1 in 200 flood risk area with a high water table. If developed this could negatively impact on watercourses.' and 'A flood risk assessment, water impact assessment and drainage impact assessment will be required. 'State that a Flood Risk Assessment, Water Impact Assessment and Drainage Impact Assessment will be required to be carried out.	Partially agree. Impacts on flood risk are not a matter for the Water SEA Topic. The lack of sewerage treatment in Potterton is under review. As such, the pre mitigation effect has been amended to - -. No change is required to the post mitigation score (0).	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP1	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Climatic Factors' Effect from – (Negative) to - - (Significant Negative).	Agree. Amended SEA Topic 'Climatic Factors' Effect from – (Negative) to - - (Significant Negative). Add following wording in comments section	Appendix 8.7, Table 8.7.3 and Formartine Annex

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		Add following wording in comments section 'The development is within an area identified as high flood risk. Impacts are likely to be localised and long-term.'	'The development is within an area identified as high flood risk. Impacts are likely to be localised and a Flood Risk Assessment will be required.'	of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP1	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Soil' Effect from 0 (Neutral) to – (Negative). Add following wording into comments section 'The site lies on agricultural land which is a limited resource and cannot be replaced. It will result in soil sealing, structural change in soils and change in soil organic matter. Impacts are likely to be localised and long-term. No intervention is available to mitigate against this loss. This would have a long-term impact.'	Disagree. The site is not located on Prime Agricultural Land, which would trigger a negative effect. No change is required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP1	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Investigations into wildlife habitat would require to be carried out and this has not been mentioned in the SEA in the PLDP. Amend SEA Topic 'Biodiversity' Effect from + (Positive) to - - (Significant Negative). Add following wording into comments section 'Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are set to the north. This site is at a very close proximity to the qualifying sites and likely to have an impact on the qualifying species. The development would have an effect indirectly through recreation pressures, land	It is accepted that the Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are not mentioned, whereas they are for other sites, and they should be acknowledged. However, in light of NatureScot's comments on the Habitats Regulation Appraisal, they state that impact the allocations are not likely to have an adverse effect in the integrity for any goose SPAs in relation to on geese	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		take for development, drainage and impact on geese grazing Areas.', 'The development of a greenfield site is likely to have long-term irreversible adverse impact on biodiversity through the loss of habitats and/or habitat fragmentation and/or disturbance to species that use the site as a habitat. It will also result in soil sealing, structural change in soils and change in soil organic matter. Impacts are likely to be localised and long-term.', 'The development is not likely to conserve, protect and enhance the diversity of species and habitats, and the natural heritage of the area.', 'The development is likely to adversely affect populations of protected species, including European Protected Species, their habitats and resting places or roosts such as red squirrel, bats, water voles, common lizard and badger, and many species of birds including skylarks, owls, kestrel, tree sparrows, grey partridge and lapwing. A habitats and wildlife assessment would be required to mitigate effects.' and 'The site includes Ancient Woodland which must be protected from development'. State that investigation into wildlife habitat would require to be carried out.	foraging. Likewise, increased recreational disturbance to SPAs are likely to have no adverse effect on their integrity. Amended the SEA for this site (and other sites, to state, "The Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are located to the north of this site. However, this site is not likely to have an adverse effect on the integrity of geese in terms of them foraging for food on fields. Likewise, increased recreational disturbance to SPAs are likely to have no adverse effect on their integrity."	
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP1	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Landscape' Effect from – (Negative) to - - (Significant Negative). Remove following wording from comments section 'However, given that over a long term, what gets developed becomes part of the landscape, the effects are only likely to be medium-term'. Insert	Disagree. It is accepted that there will be a negative impact on this site initially. However, given houses already exist between the two minor roads, and the green belt is a tool for managing growth, the neutral impact is justified.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		following wording 'Significant scale development that would alter the character of the area which is within the Green Belt. May generate significant landscape and visual impacts. The development is a large extension into the landscape and would have a negative impact on the setting of the settlements of both Potterton and Milton of Potterton and the landscape character. The effect is likely to be long-term. Due to the scale of development relative to the settlements, it is unlikely that strategic planting will mitigate impact. The landscape would be altered, and a housing estate would be formed which would lose the identity of rural character. Screen planting is not likely to mitigate against this loss.'		
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP1	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Material Assets' first point in the comments section to read 'There are a number of infrastructure constraints associated with this site, including education provision at Balmedie Primary School and the road access which is inadequate for a development of this scale.', amend the second point to read to read 'Access relies on an unclassified road and a C class road.' And amend the third point to read to read: 'The proposal will lead to significant pressure on local infrastructure. The proposal will have negative effects on existing infrastructure as it is of a scale which increases the pressure on the sewage network.'	Disagree. The SEA already highlights likely infrastructure issues. All issues must be resolved to the satisfaction of the Planning Service before development commences, and none of these issues prevent the principle of developing on this site. No change required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP1	It is argued that the SEA contains inaccuracies, omissions, and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Human Health' Effect from + (Positive) to – (Negative). Amend wording in the first point in the comments section to read to read: 'It would result in the loss of open space as the site is on agricultural land within the Green Belt.' and insert the following wording 'It risks reducing active travel opportunities as access relies on an unclassified and a C class road which are currently used for walking, cycling and horse riding and are narrow with no footpaths or cycle paths. Increased vehicle traffic on these roads resulting for a large housing development would severely limit opportunities for safe walking and cycling'.	Disagree. It would be expected that the unclassified road would be upgraded with paths, and the PLDP stated that links are required with the existing settlement. Agricultural land does not count as public open space. No change is required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP1	It is argued that the SEA contains inaccuracies, omissions, and misleading statements. Environmental consequences have not been adequately considered. Investigations into archaeology would require to be carried out and this has not been mentioned in the SEA in the PLDP. Amend SEA Topic 'Cultural Heritage' comments to remove the sentence which states, 'Unlikely to have any effect on the historic environment' and insert the following wording 'The development may weaken the sense of place, and the identity of existing settlements. It would not be possible to mitigate against erosion of sense of place/place identity through new developments', 'Development would result in the loss of NJ91NW0029 – Cropmarks of rig and furrow. The impact would be permanent and irreversible.'	Partially agree. This site has been intensely farmed and only site investigations identify the importance of the site, which is not scheduled. The impact to the scheduled monuments is low given the presence of trees and houses. Amended effect to '- -' and post mitigation effect to '- /?'. Change first bullet point to, "Development would result in the loss of rig and furrow cropmarks. The impact would be permanent and irreversible. Investigations into archaeology	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		and 'There are 2 scheduled monuments within 800 m. Standard SMR on site and various others within 500m. These may be negatively impacted by development.'. State that investigations into archaeology would be required to be carried out	would be required to be carried out."	
Phylis Mathers PP0854	Site Assessment – Formartine – Potterton OP1	Review the SEA for this site, as there is missing information that is not in line with other sites in the village that refer to the adverse impacts of biodiversity in relation to proximity to qualifying sites and impacts on qualifying species.	Agree. See response to respondent PP0787 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
John Hopkins PP0886	Site Assessment – Formartine – Potterton OP1	The SEA omits reference to protected species for this site.	Agree. See response to respondent PP0787 above on Potterton OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
John Hopkins PP0886	Site Assessment – Formartine – Potterton OP1	Amend Environmental Report so that bid site FR120 and site OP1 are assessed consistently. Site FR120 had an overall positive impact and was rejected. The assessment for FR120 focuses on school capacity, which is less detailed in the OP sites' assessments, and is located near amenities and not in proximity to natural heritage sites. Roads were considered an issue in FR120; however, mitigation was put forward whilst no mitigation was presented for the OP site. Negative impact on air quality, climate factors, soil and landscape were recorded for FR120 whilst these negative impacts are not recorded for the proposed OP site. The site is also contaminated. Respondent proposes the following wording to comments and mitigation measures for	Disagree. Each site was assessed on its merits using the methodology agreed in the SEA Scoping Report. Site FR120 is a much bigger site (435 homes, retail and school) than site OP1 (172 homes). Mitigation measures are proposed to protect existing woodland through a buffer strip. No change required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		site OP1, 'The site is adjacent to Ancient Woodland and has a negative biodiversity' and amend the Biodiversity score to – (negative).		
Gwen Pirie PP0887	Site Assessment – Formartine – Potterton OP1	The SEA omits reference to protected species for this site.	Agree. See response to respondent PP0787 above on Potterton site OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Gwen Pirie PP0887	Site Assessment – Formartine – Potterton OP1	Amend Environmental Report so that bid site FR120 and site OP1 are assessed consistently. Site FR120 had an overall positive impact and was rejected. The assessment for FR120 focuses on school capacity, which is less detailed in the OP sites' assessments, and is located near amenities and not in proximity to natural heritage sites. Roads were considered an issue in FR120; however, mitigation was put forward whilst no mitigation was presented for the OP site. Negative impact on air quality, climate factors, soil and landscape were recorded for FR120 whilst these negative impacts are not recorded for the proposed OP site. The site is also contaminated. Respondent proposes the following wording to comments and mitigation measures for site OP1, 'The site is adjacent to Ancient Woodland and has a negative biodiversity' and amend the Biodiversity score to – (negative).	Disagree. Each site was assessed on its merits using the methodology agreed in the SEA Scoping Report. Site FR120 is a much bigger site (435 homes, retail and school) than site OP1 (172 homes). Mitigation measures are proposed to protect existing woodland through a buffer strip. No change required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Amanda Russell PP0913	Site Assessment – Formartine – Potterton OP1	Is concerned that the biodiversity impact has not been assessed within the SEA. Other sites within the village refer to the negative impacts of Biodiversity as: "Ythan Estuary, Sands of Forvie and Meikle Loch	Agree. See response to respondent PP0787 above on Potterton site OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		SPA and Sands of Forvie SAC are set to the north. This site is at a very close proximity to the qualifying sites and likely to have an impact on the qualifying species. "The proximity to these areas of biodiversity is noted throughout the report for proposed sites around Potterton, but has been omitted for site OP1, which is within the same close proximity to "qualifying sites" and "qualifying species". The Local Authority cannot choose to use information for one proposed site but omit it for another, when the sites are all within the same close proximity.		of the full assessment
Andrew Russell PP0915	Site Assessment – Formartine – Potterton OP1	Is concerned that the biodiversity impact has not been assessed within the SEA. Other sites within the village refer to the negative impacts of Biodiversity as: "Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are set to the north. This site is at a very close proximity to the qualifying sites and likely to have an impact on the qualifying species. "The proximity to these areas of biodiversity is noted throughout the report for proposed sites around Potterton, but has been omitted for site OP1, which is within the same close proximity to "qualifying sites" and "qualifying species". The Local Authority cannot choose to use information for one proposed site but omit it for another, when the sites are all within the same close proximity.	Agree. See response to respondent PP0787 above on Potterton site OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Peter Anderson PP1171	Site Assessment – Formartine – Potterton OP1	They have reported that there is an omission on the biodiversity impact. They stated that the assessment of biodiversity impact would be the same as the other sites that were not allocated.	Agree. See response to respondent PP0787 above on Potterton site OP1.	Appendix 8.7, Table 8.7.3 and Formartine Annex

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
				of the full assessment
Gordon Burgess PP0144	Site Assessment – Formartine – Potterton OP2	Has raised concern about the omission of information relating biodiversity and states that the sites are in proximity to qualifying sites and likely to impact on qualifying and protected species.	<p>It is accepted that the Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are not mentioned, whereas they are for other sites, and they should be acknowledged. However, in light of NatureScot's comments on the Habitats Regulation Appraisal, they state that impact the allocations are not likely to have an adverse effect in the integrity for any goose SPAs in relation to on geese foraging. Likewise, increased recreational disturbance to SPAs are likely to have no adverse effect on their integrity.</p> <p>Amended the SEA for this site (and other sites, to state, "The Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are located to the north of this site. However, this site is not likely to have an adverse effect on the integrity of geese in terms of them foraging for food on fields. Likewise, increased recreational</p>	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			disturbance to SPAs are likely to have no adverse effect on their integrity."	
Stephen Nicol PP0209	Site Assessment – Formartine – Potterton OP2	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Jennifer Nicol PP0210	Site Assessment – Formartine – Potterton OP2	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Jamie Black PP0212	Site Assessment – Formartine – Potterton OP2	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Doranne Dawson PP0231	Site Assessment – Formartine – Potterton OP2	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Graeme Dawson PP0232	Site Assessment – Formartine – Potterton OP2	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Kerry Robertson PP0361	Site Assessment – Formartine – Potterton OP2	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Aaron Dobby PP0527	Site Assessment – Formartine – Potterton OP2	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Kerry Dobby PP0528	Site Assessment – Formartine – Potterton OP2	There is an omission of information on biodiversity as other sites in the village refer to the negative impacts of biodiversity due to proximity to the qualifying sites and likely impact on qualifying species. Therefore, proximity to 'qualifying sites' and 'qualifying species' should be factored into the SEA.	Agree. See response to respondent PP0144 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Craig Leslie PP0645	Site Assessment – Formartine – Potterton OP2	The assessment for 'landscape' does not justify the post mitigation effect as 'neutral'.	Disagree. It is accepted that there will be a negative impact on this site initially. However, given houses already exist between the B999 and the unclassified Manse Road, and	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			the green belt is a tool for managing growth, the neutral impact is justified.	
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP2	The SEA does not provide necessary assurance of meeting SPP and SEA guidance from 30/8/2013. The site should be removed until such time the identified issues have been resolved for potential inclusion in the future.	Disagree. The Scoping Report set out the proposed methodology for assessing all bid sites, and was agreed by the SEA Consultation Authorities. All issues will be considered at the planning application stage. However, at present, the principle of developing on this site has been accepted, and likely mitigation measures highlighted.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP2	Has argued that many of the SEA assessments of effects are not justified Specifically, the SEA does not make key findings clear, has failed to identify important environmental issues early, and appears to use the SEA to defend the Plan. The site should be removed until such time the identified issues have been resolved for potential inclusion in the future.	Disagree. The Scoping Report set out the proposed methodology for assessing all bid sites, and was agreed by the SEA Consultation Authorities. All issues will be considered at the planning application stage. However, at present, the principle of developing on this site has been accepted, and likely mitigation measures highlighted.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP2	Has argued that many of the SEA assessments are not sufficiently clear and complete to enable informed judgements to be made by consultees on	Disagree. The Scoping Report set out the proposed methodology for assessing all	Appendix 8.7, Table 8.7.3 and Formartine Annex

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		the proposed development. Specifically, the SEA does not make key findings clear, has failed to identify important environmental issues early, and appears to use the SEA to defend the Plan. Considers that sites OP1 and OP2 should be removed from the PLDP, until such time the identified issues have been resolved for potential inclusion in the future.	bid sites, and was agreed by the SEA Consultation Authorities. All issues will be considered at the planning application stage. However, at present, the principle of developing on this site has been accepted, and likely mitigation measures highlighted.	of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP2	The SEA has not adequately considered impact on biodiversity.	Disagree. Mitigation measures have been identified (a buffer strip next to watercourse and woodland). Further mitigation measures would be more appropriately addressed at the planning application stage. The SEA did not identify issues that would prevent the principle of development on the site.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP2	The SEA has not adequately considered impact on climatic factors.	The neutral score for climate factors is sound. However, the SEA has been amended to state "Electric vehicles, and increased critical mass (customers) of public transport and local services will reduce the proposals potential impact."	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP2	The SEA has not adequately considered impact on landscape.	Disagree. It is accepted that there will be a negative impact on this site initially. However,	Appendix 8.7, Table 8.7.3 and Formartine Annex

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			given houses already exist between the B999 and the unclassified Manse Road, and the green belt is a tool for managing growth, the neutral impact is justified.	of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP2	The SEA has not adequately considered impact on material assets.	Disagree. Any adverse impact to local infrastructure must be mitigated before development can proceed. Any issues on education and roads will be investigated at the planning application stage. No change is required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Erik Leslie PP0647	Site Assessment – Formartine – Potterton OP2	The SEA has not adequately considered impact on cultural heritage.	Partially agree. Amended effect to '- -' and post mitigation effect to '-/?'. Change first bullet point to, "Development would result in the loss of cropmarks (e.g. oval enclosure) and other locally important remains. The impact would be permanent and irreversible. Investigations into archaeology may be required to be carried out."	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP2	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Air' Effect from 0	Disagree. While the increase in emissions is likely, it will not be significant, as its scale and location will not decrease air	Appendix 8.7, Table 8.7.3 and Formartine Annex

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		(Neutral) to – (Negative) and replace wording in comments section to read ‘proposal of this scale will lead to a significant decrease in air quality (i.e. through increases in concentrations of air - pollutants) Effects are likely to be medium/long-term’.	quality in Ellon or Aberdeen. Use of electric vehicles and public transport will also mitigate effects. No change required.	of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP2	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. A Flood Risk Assessment, Water Impact Assessment and Drainage Impact Assessment will be required, and this has not been mentioned in the SEA in the PLDP. Amend SEA Topic ‘Water’ Effect from 0 (Neutral) to - - (Significant Negative) effect and add the following wording into the comments section ‘The proposal is likely to have a significant negative effect as it will exceed public sewage treatment capacity in the area. Effects are likely to be localised and long-term, however the negative impacts could be mitigated through developer obligations and a Scottish Water growth project.’, ‘There is a significant existing surface water flood risk. The site is in a 1 in 200 flood risk area with a high water table. If developed this could negatively impact on watercourses.’ and ‘A flood risk assessment, water impact assessment and drainage impact assessment will be required. State that a Flood Risk Assessment, Water Impact Assessment and Drainage Impact Assessment will be required to be carried out.	Partially agree. Impacts on flood risk are not a matter for the Water SEA Topic. The lack of sewerage treatment in Potterton is under review. As such, the pre mitigation effect has been amended to - -. No change is required to the post mitigation score (0).	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP2	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Climatic Factors' Effect from – (Negative) to - - (Significant Negative). Add following wording in comments section 'The development is within an area identified as high flood risk. Impacts are likely to be localised and long-term.'	Partially agree. Given the scale and location of the surface water flood risk, no change to the score is required. However, following wording has been added in comments section 'The development includes an area identified as high flood risk. Impacts are likely to be localised and a Flood Risk Assessment will be required.'	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP2	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Soil' Effect from 0 (Neutral) to – (Negative). Add following wording into comments section 'The site lies on agricultural land which is a limited resource and cannot be replaced. It will result in soil sealing, structural change in soils and change in soil organic matter. Impacts are likely to be localised and long-term. No intervention is available to mitigate against this loss. This would have a long-term impact.'	Disagree. The site is not located on Prime Agricultural Land, which would trigger a negative effect. No change is required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP2	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Investigations into wildlife habitat would require to be carried out and this has not been mentioned in the SEA in the PLDP. Amend SEA Topic 'Biodiversity' Effect from + (Positive) to - - (Significant Negative). Add following wording into comments	It is accepted that the Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are not mentioned, whereas they are for other sites, and they should be acknowledged. However, in light of NatureScot's comments	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		<p>section 'Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are set to the north. This site is at a very close proximity to the qualifying sites and likely to have an impact on the qualifying species. The development would have an effect indirectly through recreation pressures, land take for development, drainage and impact on geese grazing Areas.', 'The development of a greenfield site is likely to have long-term irreversible adverse impact on biodiversity through the loss of habitats and/or habitat fragmentation and/or disturbance to species that use the site as a habitat. It will also result in soil sealing, structural change in soils and change in soil organic matter. Impacts are likely to be localised and long-term.', 'The development is not likely to conserve, protect and enhance the diversity of species and habitats, and the natural heritage of the area.', 'The development is likely to adversely affect populations of protected species, including European Protected Species, their habitats and resting places or roosts such as red squirrel, bats, water voles, common lizard and badger, and many species of birds including skylarks, owls, kestrel, tree sparrows, grey partridge and lapwing. A habitats and wildlife assessment would be required to mitigate effects.' and 'The site includes Ancient Woodland which must be protected from development'. State that investigation into wildlife habitat would require to be carried out.</p>	<p>on the Habitats Regulation Appraisal, they state that impact the allocations are not likely to have an adverse effect in the integrity for any goose SPAs in relation to on geese foraging. Likewise, increased recreational disturbance to SPAs are likely to have no adverse effect on their integrity.</p> <p>Amended the SEA for this site (and other sites, to state, "The Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are located to the north of this site. However, this site is not likely to have an adverse effect on the integrity of geese in terms of them foraging for food on fields. Likewise, increased recreational disturbance to SPAs are likely to have no adverse effect on their integrity."</p>	

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP2	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Landscape' Effect from – (Negative) to - - (Significant Negative). Remove following wording from comments section 'However, given that over a long term, what gets developed becomes part of the landscape, the effects are only likely to be medium-term' and insert following wording 'Significant scale development that would alter the character of the area which is within the Green Belt. May generate significant landscape and visual impacts. The development is a large extension into the landscape and would have a negative impact on the setting of the settlements of both Potterton and Milton of Potterton and the landscape character. The effect is likely to be long-term. Due to the scale of development relative to the settlements, it is unlikely that strategic planting will mitigate impact. The landscape would be altered, and a housing estate would be formed which would lose the identity of rural character. Screen planting is not likely to mitigate against this loss.'	Disagree. It is accepted that there will be a negative impact on this site initially. However, given houses already exist between the two minor roads, and the green belt is a tool for managing growth, the neutral impact is justified.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP2	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Material Assets' first point in the comments section to read 'There are a number of infrastructure constraints associated with this site, including education provision at Balmedie Primary School and the road access which is	Disagree. The SEA already highlights likely infrastructure issues. All issues must be resolved to the satisfaction of the Planning Service before development commences, and none of these issues prevent the	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		inadequate for a development of this scale.', amend the second point to read to read 'Access relies on an unclassified road and a C class road.' And amend the third point to read to read: 'The proposal will lead to significant pressure on local infrastructure. The proposal will have negative effects on existing infrastructure as it is of a scale which increases the pressure on the sewage network.'.	principle of developing on this site. No change required.	
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP2	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Amend SEA Topic 'Human Health' Effect from + (Positive) to – (Negative). Amend wording in the first point in the comments section to read to read: 'It would result in the loss of open space as the site is on agricultural land within the Green Belt.' and insert the following wording 'It risks reducing active travel opportunities as access relies on an unclassified and a C class road which are currently used for walking, cycling and horse riding and are narrow with no footpaths or cycle paths. Increased vehicle traffic on these roads resulting for a large housing development would severely limit opportunities for safe walking and cycling'.	Disagree. It would be expected that the unclassified road would be upgraded with paths, and the PLDP stated that links are required with the existing settlement. Agricultural land does not count as public open space. No change is required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Audrey Wright PP0787	Site Assessment – Formartine – Potterton OP2	It is argued that the SEA contains inaccuracies, omissions and misleading statements. Environmental consequences have not been adequately considered. Investigations into archaeology would require to be carried out and this has not been mentioned in the SEA in the PLDP. Amend SEA Topic 'Cultural Heritage' comments to remove the	Partially agree. This site has been intensely farmed and only site investigations identify the importance of the site, which is not scheduled. The impact to the scheduled monuments is low given the presence of trees and	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		sentence which states, 'Unlikely to have any effect on the historic environment' and insert the following wording 'The development may weaken the sense of place, and the identity of existing settlements. It would not be possible to mitigate against erosion of sense of place/place identity through new developments', 'Development would result in the loss of NJ91NW0029 – Cropmarks of rig and furrow. The impact would be permanent and irreversible.' and 'There are 2 scheduled monuments within 800 m. Standard SMR on site and various others within 500m. These may be negatively impacted by development.'. State that investigations into archaeology would be required to be carried out	houses. Amend effect to '- -' and post mitigation effect to '- /?'. Changed first bullet point to, "Development would result in the loss of cropmarks (e.g. oval enclosure) and other locally important remains. The impact would be permanent and irreversible. Investigations into archaeology may be required to be carried out."	
Phylis Mathers PP0854	Site Assessment – Formartine – Potterton OP2	Review the SEA for this site, as there is missing information that is not in line with other sites in the village that refer to the adverse impacts of biodiversity in relation to proximity to qualifying sites and impacts on qualifying species.	Agree. See response to respondent PP0787 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
John Hopkins PP0886	Site Assessment – Formartine – Potterton OP2	The SEA omits reference to protected species for this site.	Agree. See response to respondent PP0787 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
John Hopkins PP0886	Site Assessment – Formartine – Potterton OP2	Amend Environmental Report so that bid site FR120 and site OP2 are assessed consistently. Site FR120 had an overall positive impact and was rejected. The assessment for FR120 focuses on school capacity, which is less detailed in the OP sites' assessments, and is located near amenities and not	Disagree. Each site was assessed on its merits using the methodology agreed in the SEA Scoping Report. Site FR120 is a much bigger site (435 homes, retail and school) than site OP2	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		in proximity to natural heritage sites. Roads were considered an issue in FR120; however, mitigation was put forward whilst no mitigation was presented for the OP site. Negative impact on air quality, climate factors, soil and landscape were recorded for FR120 whilst these negative impacts are not recorded for the proposed OP site. The site is also contaminated. Respondent proposes the following wording to comments and mitigation measures for site OP2, 'The site is adjacent to Ancient Woodland and has a negative biodiversity' and amend the Biodiversity score to – (negative).	(61 homes). Mitigation measures are proposed to protect existing woodland through a buffer strip. No change required.	
Gwen Pirie PP0887	Site Assessment – Formartine – Potterton OP2	The SEA omits reference to protected species for this site.	Agree. See response to respondent PP0787 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Gwen Pirie PP0887	Site Assessment – Formartine – Potterton OP2	Amend Environmental Report so that bid site FR120 and site OP2 are assessed consistently. Site FR120 had an overall positive impact and was rejected. The assessment for FR120 focuses on school capacity, which is less detailed in the OP sites' assessments, and is located near amenities and not in proximity to natural heritage sites. Roads were considered an issue in FR120; however, mitigation was put forward whilst no mitigation was presented for the OP site. Negative impact on air quality, climate factors, soil and landscape were recorded for FR120 whilst these negative impacts are not recorded for the proposed OP site. The site is also contaminated. Respondent proposes the following	Disagree. Each site was assessed on its merits using the methodology agreed in the SEA Scoping Report. Site FR120 is a much bigger site (435 homes, retail and school) than site OP1 (172 homes). Mitigation measures are proposed to protect existing woodland through a buffer strip. No change required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		wording to comments and mitigation measures for site OP2, 'The site is adjacent to Ancient Woodland and has a negative biodiversity' and amend the Biodiversity score to – (negative).		
Amanda Russell PP0913	Site Assessment – Formartine – Potterton OP2	Is concerned that the biodiversity impact has not been assessed within the SEA. Other sites within the village refer to the negative impacts of Biodiversity as: "Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are set to the north. This site is at a very close proximity to the qualifying sites and likely to have an impact on the qualifying species. "The proximity to these areas of biodiversity is noted throughout the report for proposed sites around Potterton, but has been omitted for site OP1, which is within the same close proximity to "qualifying sites" and "qualifying species". The Local Authority cannot choose to use information for one proposed site but omit it for another, when the sites are all within the same close proximity.	Agree. See response to respondent PP0787 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Andrew Russell PP0913	Site Assessment – Formartine – Potterton OP2	Is concerned that the biodiversity impact has not been assessed within the SEA. Other sites within the village refer to the negative impacts of Biodiversity as: "Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are set to the north. This site is at a very close proximity to the qualifying sites and likely to have an impact on the qualifying species. "The proximity to these areas of biodiversity is noted throughout the report for proposed sites around Potterton, but has been omitted for site OP1, which is within the same close proximity to "qualifying sites" and "qualifying species". The Local	Agree. See response to respondent PP0787 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		Authority cannot choose to use information for one proposed site but omit it for another, when the sites are all within the same close proximity.		
Peter Anderson PP1171	Site Assessment – Formartine – Potterton OP2	They have reported that there is an omission on the biodiversity impact. They stated that the assessment of biodiversity impact would be the same as the other sites that were not allocated.	Agree. See response to respondent PP0787 above on Potterton site OP2.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Ian Ross PP0894 and PP1234	Site Assessment – Formartine – Rashierieve Foveran SR1	Has reported that the SEA erroneously states that no alternative sites were proposed for Rashierieve Foveran. This is incorrect as bid site FR109 and MIR submission 1020 were submitted both as an extension of OP1 and SR1. As a result, FR109 has not been assessed under the options for the settlement. They highlighted the following with respect to land to the west of SR1: · The development is unlikely to have an effect on air quality, climatic factors, biodiversity, human health or the historic environment; · Would not lead to significant pressure on local infrastructure; · The nature of land would be changed but given low sensitivity of the landscape this is not considered significant; The introduction of strategic landscaping along AWPR would ensure that coalescence would not occur with Foveran.	Disagree. Site FR109 lies between Foveran and Rshierieve Forveran, and site FR109 was assessed an alternative site under Foveran. Negative effects are proposed for all SEA Topics except human health given its scale, limited WWTW, flood risk, loss of prime agricultural land, and heritage impact.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Kevin Simpson PP0030	Site Assessment – Formartine – Rothienorman OP1	Under SEA Topic 'Water', change "There is available capacity at Rothienorman WWTW" to "There is insufficient capacity at Rothienorman WWTW, which should be addressed prior to any development".	Partially agree. Amended to "There is limited capacity at Rothienorman Waste Water Treatment Works."	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Kevin Simpson PP0030	Site Assessment – Formartine – Rothienorman OP1	Under SEA Topic 'Water', change "Whilst the proposed development is in close proximity to a watercourse, there would be no impacts arising as a result" to "The proposed development is in close proximity to a watercourse, whilst there are likely to be no impacts arising for the proposed development itself, the proposed development may well have an impact on other properties closer to and downstream on the water course, which have already suffered flooding due to excess run off." They argued that the Issues and Actions paper stated that flooding issues needs to be addressed prior to any new development and a good degree of existing flooding issues are caused by new developments.	Disagree. Firstly, the Water SEA Topic covers water quality and not flooding, which is considered under Climatic Factors. Secondly, site OP1 has not been identified by SEPA as requiring flood mitigation measures, as set out in the PLDP. No change required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Kevin Simpson PP0030	Site Assessment – Formartine – Rothienorman OP2	Under SEA Topic 'Water', change "There is available capacity at Rothienorman WWTW" to "There is insufficient capacity at Rothienorman WWTW, which should be addressed prior to any development".	Partially agree. Amended to "There is limited capacity at Rothienorman Waste Water Treatment Works."	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
Kevin Simpson PP0030	Site Assessment – Formartine – Rothienorman OP1, OP2, FR033, FR112	Under SEA Topic 'Water', change "There is available capacity at Rothienorman WWTW" to "There is insufficient capacity at Rothienorman WWTW, which should be addressed prior to any development".	Partially agree. Amended to "There is limited capacity at Rothienorman Waste Water Treatment Works."	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Formartine – Tipperty OP2	This site is at significant risk from flooding and SEPA does not agree with the SFRA that this can be dealt with by SUDS and buffer strips alone. Mitigation measures they have suggested are: removal from the Plan or; amendment of the site boundary and	Agree. Amended climate change to state that a detailed Flood Risk Assessment (FRA) is required.	Appendix 8.7, Table 8.7.3 and Formartine Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		proposed site access to exclude areas of the flood extent or; a detailed Flood Risk Assessment (FRA) is submitted prior to being allocated in the finalised Plan. Unless the latter one/both of the latter two mitigation measures are undertaken, we request the score for Climatic Factors be - -		
CHAP Group (Aberdeen) Ltd PP1126	Site Assessment – Garioch – Blackburn OP1 and other bids	Review SEA Topic Biodiversity for site OP1 in Blackburn, and other bid sites at Kinellar Estate and Hillhead of Glasgogo to ascertain level of tree loss and level of impact (score). They are likely to result in a loss of mature trees and would therefore have a greater negative impact.	Noted, but all other sites have mentioned the loss of trees in the SEA. As such, no changed required.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
CHAP Group (Aberdeen) Ltd PP1126	Site Assessment – Garioch – Blackburn GR085	Review SEA Topic Biodiversity for bid GR085 as it will not result in the loss of trees. The site has been designed to avoid any loss of the few trees that exist on the site. This is illustrated by the indicative layout.	Disagree. Any loss of habitats will have a negative impact, regardless of the scale of loss. However, the mitigation measures are noted, and the final score is neutral. No change required.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Garioch – Hatton of Fintray OP1	HES noted that site OP1 in Hatton Fintray is located approximately 210m west of the scheduled monument known as Jasmine Cottage, cursus monument and barrows 160m SE of (SM 6572), and given the location of the proposed housing allocation adjacent to existing settlement and the distance to the monument, HES is content that the proposed development will not significantly impact on its setting	Updated assessment of site OP1 in Hatton Fintray to note that it is located west of Jasmine Cottage, a scheduled monument (for cursus monument and barrows), and 160m SE of a Neolithic/Bronze Age cursus monument and barrows. Given the location of the proposed housing allocation adjacent to existing settlement	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			and the distance to the monument, the proposed development will not significantly impact on its setting.	
SEPA (PP1299 and PP1344)	Site Assessment – Garioch – Inch OP1	This site is at significant risk from flooding. SEPA will only support the assessment score for Climatic Factors in Table 8.7.2 if their requested mitigation measures (in the allocation summary) are undertaken. If not, the score for Climatic Factors should be - -	No change required. SEPA's proposed mitigation measures for site OP1 have been added to the PLDP.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Garioch – Inch R4	This site is at significant risk from flooding. SEPA will only support the assessment score for Climatic Factors in Table 8.7.4 if their requested mitigation measures (in the allocation summary) are undertaken. If not, the score for Climatic Factors should be - -	No change required. SEPA's proposed mitigation measures for site R4 have been added to the PLDP (flood risk assessment).	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Garioch – Kemnay OP1	This site is at significant risk from flooding. SEPA will only support the assessment score for Climatic Factors in Table 8.7.2 if their requested mitigation measures (in the allocation summary) are undertaken. If not, the score for Climatic Factors should be - -	No change required. SEPA's proposed mitigation measures for site OP1 have been added to the PLDP (flood risk assessment).	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
Barratt North Scotland PP1282	Site Assessment – Garioch – Kirkton of Skene GR116	Agreed that the proposal would have neutral effects post mitigation on air, water, soil, biodiversity, material assets and human health, while population is identified as having a positive/neutral effect.	Noted. No action required.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
Barratt North Scotland PP1282	Site Assessment – Garioch – Kirkton of Skene GR116	Disagreed that the development could have a long-term negative impact due to the potential for increased travel requirements. Requested the is re-evaluated taking account of all the paths linked to site GR116 and public transport routes available. Has highlighted that the bus stop is 0.5 miles to the west and public transport passes along the Old Skene Road to the north of the site and hence, there is a scope for a new bus stop within 400m of the site. The site is located within 400m of the centre of the settlement. New green path network is achievable and there are good cycle routes from the site towards neighbouring settlements to the west, north and south. There is existing footpaths that links to the centre of the settlement.	Disagree. While the number of homes (35-45) would not have a negative impact on climatic factors, the site measures more than 3 hectares. As such, a major housing development could be accommodated on this site, which could have a long-term negative impact. The local bus stops are noted, which would mitigate this impact. No change required.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
Barratt North Scotland PP1282	Site Assessment – Garioch – Kirkton of Skene GR116	Disagreed with the “small parts of the site are at risk from surface water flooding. A flood risk assessment may be required”. Requested reassessing the parts of the site that can be deliverable and the parts that can be mitigated through landscape. Stated that SEPA flood map shows very small areas being at risk of surface water flooding on the southern part of the site, and it mostly falls out with developable area, which can be incorporated through proposed landscaping. A Flood risk assessment can be submitted, if required.	Disagree. As per the assessment methodology set out in the SEA Scoping Report, any flood risk on a site will have a negative effect. However, the proposed mitigation measures will reduce this effect. No change required.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
Barratt North Scotland PP1282	Site Assessment – Garioch – Kirkton of Skene GR116	Disagreed that the landscape experience is likely to change and to re-evaluate the SEA after observing the Landscape and Visual Appraisal (LVA). It is argued that the LVA assessed and concluded that the changes to the landscape would be beneficial.	Disagree. Any development on this site will have an impact on the landscape, and unless the proposal is improving a derelict or unkept it is unlikely to improve	Appendix 8.7, Table 8.7.4 and Garioch Annex of

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		Highlighted that the site is an open field and therefore, the intention is to develop organically an additional phase at the south side. Sensitive landscaping would augment the existing mature tree belts around the site boundaries and former Kirkton House estate. The findings of the submitted LVA was not challenged by the council, therefore, consultation should be held with the Landscape Officer	on what is currently there, hence the neutral score. However, there is uncertainty regarding the likely impact given its location and nearby church. No change required.	the full assessment
Barratt North Scotland PP1282	Site Assessment – Garioch – Kirkton of Skene GR116	Disagreed that the development may have a negative impact on the setting of the B listed church and Graveyard, views from the east. Requested the SEA is re-evaluated after observing the Landscape and Visual Appraisal (LVA). Added, the proposal would lead to a unique high quality residential development through sensitive design, and would not impact the setting of listed building.	Disagree. The SEA rightly notes that this could have a negative or neutral impact on the listed church, depending on the design of the site. Any plans submitted at this stage are indicative and could change. No change required.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Garioch – Kingseat OP1	HES noted the inclusion of OP1 within the Kingseat Conservation Area, and while there are no listed buildings within the conservation area, there are five buildings, associated with the former hospital, that are on the national Buildings at Risk Register. Therefore, HES encourage priority is given to restoring/regenerating and safeguarding the setting of these 'at risk' buildings, together with the other former hospital buildings, settlement plan layout and spaces, that contribute positively to the special architectural and historic character of the conservation area.	Updated assessment of site OP1 to note that it is within the Kingseat Conservation Area, and while there are no listed buildings within the conservation area, there are five buildings, associated with the former hospital, that are on the national Buildings at Risk Register, and priority should be given to restoring/regenerating and safeguarding the setting of these 'at risk' buildings, together with the other former hospital	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			buildings, settlement plan layout and spaces, that contribute positively to the special architectural and historic character of the conservation area.	
John McIntosh PP0580	Site Assessment – Garioch – Kinmuck GR118	The SEA has incorrectly identified potential negative effects on water and cultural heritage post-mitigation. Through careful design the impacts on cultural heritage can be mitigated and appropriate water treatment can be adopted.	Disagree. For the Water SEA topic, unless the site connects to public WWTW as it is in a SEPA hot spot where private works are not supported, the proposal will have a significant negative effect. No change to the Cultural Heritage SEA Topic is proposed as it quite rightly identifies the impact is unknown, or if poorly designed, could be significantly negative. No change required.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
Historic Environment Scotland (PP1299)	Site Assessment – Garioch – Kintore OP1	HES stated that this site is located in the immediate vicinity of the scheduled monuments known as Aberdeenshire Canal, remains of, NW of Brae of Kintore (SM 7674) and Aberdeenshire Canal, remains of, S of Dalwearie (SM 7675). HES noted that while the allocation appears to exclude the monuments, it will be important that any development avoids any direct (i.e. physical) impacts on their legally protected scheduled areas of the monuments. They add, while the monuments (canal) are industrial in nature, they are in a largely rural and open landscape and still retain a sense of place.	Updated assessment of site OP1 in Kintore to state it is located in the vicinity of the scheduled monuments known as Aberdeenshire Canal, which comprise the remains of only a handful of surviving sections of the Aberdeen-Inverurie Canal. Although site OP1 appears to exclude the monuments, development must avoid any direct (i.e. physical) impacts,	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		Therefore, consideration should be given to mitigating the impact through sensitive housing design and potentially also landscaping, such as leaving undeveloped land as a buffer and/or using trees to screen the development from view, in line with HES Setting guidance.	and while the monuments are industrial in nature, they are located in a largely rural and open landscape and still retain a sense of place. As such consider mitigating the impact through sensitive housing design and landscaping, e.g. leaving undeveloped land as a buffer and/or using trees to screen the development from view, in line with HES Setting guidance.	
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Garioch – Midmar OP1	It is noted that that site OP1 is located 305m and 210m respectively SW of the scheduled monuments known as Craiglea, cairn 265m W of (SM 12122) and Craiglea, ring-marked boulder 440m WNW of (SM12174), but HES is content that any impact on their setting is not significant for HES's interests.	Updated assessment of site OP1 in Midmar to state that it is located to the west of several scheduled monuments known as Craiglea cairn and a ring-marked boulder. Both are situated on elevated land within an open and rural landscape, but given the location of this small allocation, which is adjacent to other small-scale housing developments, any impact on their setting will not be significant.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
Alan Newell PP0332	Site Assessment – Garioch – Old Rayne OP1	Query regarding the positive/ neutral scores for biodiversity, population and landscape, as the proposal is to knock down the historic older buildings to make way for new development.	No change required. This is site offers remediation of a brownfield site, and should continue the style of the “model” homes adjoining the	Appendix 8.7, Table 8.7.4 and Garioch Annex of

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			site. The development will not result in the loss of Category B Listed buildings at Pitmachie Farm, adjacent to the site.	the full assessment
Barratt North Scotland and Dunecht Estates PP1275	Site Assessment – Garioch – Westhill – Bids GR039, GR040 and GR041	Questioned the accuracy of the SEA as there is inconsistency in the scoring for the sites in relation to human health, and yet the supporting commentary is identical. The SEA has ignored environmental, landscape and transport analysis that has been undertaken to inform the proposed developments. Noted the development of 100 homes can be made without significant impacts. Has disputed the significant impacts in relation to water, landscape, biodiversity and cultural heritage for site GR041, but accepted that landscape character would be altered by the scale of development, although the concept masterplan has addressed this. The land is not subject to any special ecological, historic or landscape designations, is free from flood risk and contamination, and the development can be designed around the oil and gas pipelines. Areas of Ancient Woodland and surrounding historic interests could be successfully integrated into the overall development without any negative impacts.	Disagree. The three bid sites differ in scale and as such, will score differently, regardless of the (positive) commentary. The post mitigation score for site GR041 has mixed scores for most SEA Topics (e.g. --/0), as its impact could be significantly negative or neutral, depending on its layout, siting and mitigation measures. No change is required.	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment
Stewart Milne Homes PP1184	Site Assessment – Garioch – Westhill – Bid GR066	It is argued that the SEA has misrepresented the true position in assessing negative and significantly negative effects for some topic areas, with landscape standing out as a clear anomaly with no detailed landscape analysis to back up the 'significantly negative' effect conclusion. It is argued that landscape and visual effects would be limited	Disagree. On landscape matters, the site extends south for almost 700 meters beyond the unallocated bid site GR106, and is a significant southern extension of Westhill. Only one part of the site is adjacent to	Appendix 8.7, Table 8.7.4 and Garioch Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		to a localised area. Regarding SEA Topics, 'Air', 'Water' and 'Climatic Factors', they are listed as significantly negative effects and remain negative post mitigation, whilst other major Westhill site bids, with exactly the same comments under these headings, are listed as negative, improving to neutral post mitigation. No issues with SEA Topics soil, biodiversity, population and human health.	Westhill, and the remaining two parts of this site is divorced from the settlement. Regarding air, water and climatic factors, this site cannot be compared with other Westhill sites, given this site proposes a significant amount of housing (900 homes) as well as 10 ha employment land, and is to the south of the settlement. No change required.	
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Kincardine and Mearns – Blairs OP1	HES noted that the site boundary for OP1 at Blairs College Estate now excludes the listed Blairs College complex, and that the Council remains committed to managing new development in line with the planning permissions for the enabling schemes aimed at securing the restoration and re-use of the listed buildings, and safeguarding their setting. Noted that this includes planning permission APP/2019/1656, which has extended the timeframe for implementing the development and progressing a scheme for restoration/re-use of the listed buildings. Given the extended timeframe for the enabling development and continued lack of a detailed restoration scheme for the listed Blairs College buildings, most of which have been on the national Buildings at Risk register since 1990, HES urges the Council to seek additional measures to keep the buildings wind and watertight and stem further decay, while the feasibility of restoration and reuse is further explored. Adds, HES's Building's casework team would be happy to	Agreed. Updated the assessment to seek additional measures to keep the buildings wind and watertight and stem further decay, while the feasibility of restoration and reuse is further explored. Liaise with HES's Building's casework team to discussions on this, in liaison with the Council's conservation officers.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		contribute to discussions on this, in liaison with the Council's conservation officers.		
Kim Lees PP0088	Site Assessment – Kincardine and Mearns – Drumlithie KN001	Amend SEA Topics Biodiversity and Landscape to reflect that no trees would be lost because of the development.	Partially agree. Amended assessment for Biodiversity to state that “The development could result in the loss of existing trees. There is no room for compensatory planting if removed.” Amend post mitigation score to from negative to -/0. No change to the landscape score is supported as trees with no Tree Preservation Order could still be removed if in private gardens. Also, the development as a whole will have a negative impact in this area.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Kim Lees PP0088	Site Assessment – Kincardine and Mearns – Drumlithie KN001	Amend SEA Topic Climatic factors to reflect that that site KN001 is not at risk from flooding, including surface water.	SEPA’s flooding data shows the centre of the site is at risk from surface water flooding. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Kim Lees PP0088	Site Assessment – Kincardine and Mearns – Drumlithie KN001	Correct various SEA Topics to reflect that there is capacity in the local WWTP and the WTW; a ‘buffer strip’ can be provided along the Drumlithie Burn; a Flood Risk Assessment could be undertaken to determine the scale and location of the new houses; the proposed development would result in potential	Disagree. The SEA already states there is capacity in the WWTP and a Flood Risk Assessment and buffer strip would be required. The SEA already notes the remediation	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		remediation of contaminated soil; the development of the site may enhance biodiversity through the redevelopment of a brownfield site; there would be no pressure on the local infrastructure; limited impact on the population; and the proposal is unlikely to have any effects on the historic environment.	of contaminated land, biodiversity enhancement and impacts on material assets and historic environment. No change required.	
SEPA (PP1299 and PP1344)	Site Assessment – Kincardine and Mearns – Durris R1	Has requested that an additional mitigation measure is added to the 'Comments and mitigation measures' column of Table 8.7.5 to require a Peat Survey, as the site is underlain by peat.	Added an additional mitigation measure to the 'Comments and mitigation measures' column of Table 8.7.5 for site OP5 that requires developers to provide a Peat Survey.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
David O'Donnell PP0457	Site Assessment – Kincardine and Mearns – Durris R1	SEA impact assessment has not fully considered a number of issues. Impact on air quality will be affected by powering ski lifts and high number of car users. Should reassess Air as either negative or "?"	Disagree. Number of vehicles are likely to fluctuate depending on weather conditions and events. Ski lifts likely to be powered by mains electric. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
David O'Donnell PP0457	Site Assessment – Kincardine and Mearns – Durris R1	Water impact needs to account for large scale WWTW and water borne pollution. Should reassess Water as negative or "?".	Disagree. Post mitigation score is 0/? as the WWTW will have to be resolved, and any adverse impacts on water quality would be mitigated. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
David O'Donnell PP0457	Site Assessment – Kincardine and Mearns – Durris R1	Climatic impact will be significant due to loss of trees, increased emissions from travel and engineering works on site. Should reassess Climatic as negative.	Disagree. It is not known what they layout will be, but as buffers next to trees are a mitigation requirement, loss of trees for this	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			type of use would be minimal. No change required.	the full assessment
David O'Donnell PP0457	Site Assessment – Kincardine and Mearns – Durris R1	Biodiversity impact needs to account for effect on protected species and there being no biodiversity survey in place to confirm the impact. Should reassess Biodiversity as negative.	Disagree. While there would be a negative impact with no mitigation, measures would be required to reduce impacts to habitats and species (e.g. buffer strips), otherwise planning permission is unlikely to be supported.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
David O'Donnell PP0457	Site Assessment – Kincardine and Mearns – Durris R1	Material assets impact should consider economic risk and negative impact on other sites in the region. Should reassess Material Assets as "0".	Disagree. Without evidence to support this claim, and given the nature and location of the proposal, its impact on other uses may not be significant.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
David O'Donnell PP0457	Site Assessment – Kincardine and Mearns – Durris R1	In relation to population, there will be detrimental impact on the wider community, and no impact on human health due to likely limited use of the site. Should reassess Human Health as "0".	Disagree. The proposal is for a mix of year-round uses. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Kincardine and Mearns – Fordoun BUS2	As this site was a former military airfield, it requires specialist assessments to inform appropriate mitigation. Therefore it is requested that in Table 8.7.1 the score for Soil is amended to 0/?.	Agreed. Amended post mitigation effects score for soil to 0/?.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
SEPA (PP1299 and PP1344)	Site Assessment – Kincardine and Mearns – Fordoun BUS2	As this site was a former military airfield, it requires specialist assessments to inform appropriate mitigation. Therefore, it is requested that in Table 8.7.1 add the following to the Comments and mitigation measures, “Mitigations include specialist investigation for contamination due to former airfield use.”	Agreed. Amended the “Comments and mitigation measures” to “Mitigations include specialist investigation for contamination due to former airfield use.”	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Kincardine and Mearns – Marywell BUS2	Has requested that an additional mitigation measure is added to the ‘Comments and mitigation measures’ column of Table 8.7.5 to require a Peat Survey, as the site is underlain by peat.	Added an additional mitigation measure to the ‘Comments and mitigation measures’ column of Table 8.7.5 for site OP5 that requires developers to provide a Peat Survey.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Polimuir Properties (Newtonhill) Limited PP1276	Site Assessment – Kincardine and Mearns – Newtonhill bid KN101	The SEA Landscape score should have the same positive score as site OP1 in terms of impact on landscape, breaking the skyline and contribution to the green belt. Argued a southern landscape buffer remains that, as delivered with the OP1 designation, and such an approach would be entirely consistent with the approach taken throughout the Plan at the edge of settlements locations and would effectively form a new southern settlement edge. As such, there would not be any “urban creep” towards Muchalls. Adds, the review of the green belt would lessen the score on landscape impact if it was removed from KN101. Disagrees that this site should be retained as green belt as the site does not protect the landscape setting of Aberdeen, it is not required to maintain the identity of Newtonhill as there has already been land developed further south (Michael Tunstall Way), and it can provide land	Disagree. The green belt provides a visual buffer between these settlements to protect and enhances the setting of Aberdeen. A proposal on this site would result in urban creep as the site is visually prominent and is located on the highest part of this area. The coastal zone stops at the railway line, but the Special Landscape Area stretches from the coast to the A92(T) and includes KN101. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		for recreation. Adds, this site is not designated as Special Landscape Area, which mostly lies to the east of the railway line and seeks to preserve the coastal setting.		
Polimuir Properties (Newtonhill) Limited PP1276	Site Assessment – Kincardine and Mearns – Newtonhill bid KN101	The post mitigation effect of Material Assets for bid KN101 should have the same positive score as site OP1 regarding education provision. Argued the same conclusion should apply for both sites, as there is sufficient education capacity at both Newtonhill Primary and Portlethen Academy, and that the Chapelton development is largely responsible for the temporarily increased roll at Newtonhill Primary and Portlethen Academy. The Chapelton development must reserve land for 3 primary schools and 1 secondary school.	Disagree. Until a new school is provided in Chapelton, the primary school situation at Newtonhill will remain at overcapacity (even before site OP1 is built). Given the uncertainty of when a new school will be provided, the score should remain as ? (uncertain). No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Kincardine and Mearns – Portlethen OP4	Has requested that an additional mitigation measure is added to the 'Comments and mitigation measures' column of Table 8.7.5 to require a Peat Survey, as the site is underlain by peat.	Added an additional mitigation measure to the 'Comments and mitigation measures' column of Table 8.7.5 for site OP4 that requires developers to provide a Peat Survey.	Appendix 8.7, Table 8.7.5
SEPA (PP1299 and PP1344)	Site Assessment – Kincardine and Mearns – Portlethen OP4	Has requested, due to possibly 50% of the site underlain by peat that the Soil score for Portlethen OP4 is changed to -/?	Agreed. Amended the Soil score for Portlethen OP4 to -/?	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Polly Van Alstyne	Site Assessment – Kincardine and	There has been insufficient assessment of flood risk, and impact on existing home owner's private waste	Noted, but as this site is now under construction for the housing element, and a flood	Appendix 8.7, Table 8.7.5 and Kincardine and

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
PP0321	Mearns – St Cyrus OP1	water drainage from phase 2 of the development, with no firm assurances from SEPA.	risk assessment was required for site OP1. No change required.	Mearns Annex of the full assessment
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Kincardine and Mearns – Stonehaven OP3	HES noted that site OP3 in Stonehaven is located just north of the scheduled monument known as Cowie Line, pill box & anti-tank blocks 450m west of Ury House (SM 6438), a Type-22 pill box and other wartime defensive structures forming part of the WWII 'stop-lines' of the anti-invasion defences, and that the monument is presently set within trees which is likely to screen any development from view, although these views could open up in future if these trees are felled. Adds, although the allocation appears to exclude it, it will be important that any development avoids any direct (i.e. physical) impacts on the legally protected scheduled area of the monument. It's function as a strategic military site and location at this strategic crossing point of the Cowie Burn should inform any assessment of the potential impact on its setting. Sensitive housing design and potentially also landscaping - such as leaving undeveloped land, could also be considered, in line with HES Setting guidance.	Updated assessment of site OP3 in Stonehaven to state that it is located just north and west of the scheduled monument known as Cowie Line, pill box and anti-tank blocks forming part of the WWII defences. The monument is presently set within trees, which is likely to screen any development from view. Development must avoid any direct (i.e. physical) impacts on the legally protected scheduled area of the monument, which is at this strategic crossing point of the Cowie Burn. This should inform any assessment of the potential impact on its setting, and sensitive housing design and landscaping - such as leaving undeveloped land, should be considered, in line with HES Setting guidance.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns –	Review the negative score given to SEA Topic Air for bid KN050. Disagreed that bid KN050 will have a negative impact on air quality, as this site is in a more sustainable location than the allocated sites. Acknowledged there will be an increase in traffic	Disagree. The scale and location of the site on top of a cliff makes direct access to the town centre less convenient. No	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
	Stonehaven KN050	movements but the proposed food retail and land for a new primary school creates a mixed-use, sustainable site that is more accessible to both existing and future residents.	new primary school is supported on this site at present.	the full assessment
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns – Stonehaven KN050	Agreed that bid KN050 will have a neutral effect on the water capacity and surrounding water courses.	Noted. No action required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns – Stonehaven KN050	Amend the post mitigation score on SEA Topic Climatic Factors from negative/neutral to neutral. Disagreed that bid KN050 will have a negative/neutral post mitigation score on SEA Topic Climatic Factors, as the site is located within close proximity to public transport routes and the town centre and is significantly more sustainable and accessible than other development opportunities in Stonehaven. As such, the post mitigation effect should be neutral.	Disagree. The scale and location of the site on top of a cliff makes direct access to the town centre less convenient. As such the site could have a negative or neutral score. It could also increase traffic and pollutants in Stonehaven. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns – Stonehaven KN050	Review the significant negative score given to SEA Topic Soil. Disagreed that bid KN050 will have a significant negative impact on soil, as while it has prime agricultural land, due to the size and shape of the site, it does not lend itself to modern farming practices. Therefore, this issue should not be significant enough to be a constraint to development. Noted that this has not been raised as a constraint to development in the Site Assessment for the 2016 MIR (Site KM043), through the LDP 2017	Disagree. Prime agricultural land is regarded as an important resource in the LDP, and it should only be developed upon in exceptional circumstances (e.g. in this case to meet the spatial strategy / housing need). Also disagree that this land cannot be farmed, as fields along this coastline continue to	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		Report of Examination or within the Reporters consideration of the previous appeal on the Site (PPA-110-2317).	be cultivated. No change required.	
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns – Stonehaven KN050	Agreed that bid KN050 will have a positive effect on SEA Topic Biodiversity as there an opportunity to expand the green network through the proposed development.	Noted. No action required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns – Stonehaven KN050	Questioned the reasoning behind bid KN050 scoring a negative/neutral effect in the SEA Topic Landscape, as the Council Officers have previously dismissed the site through the MIR due to the impact on the South East Coast Special Landscape Area (SLA). Suggests this appears to be less of a constraint on development. Adds, the proposed development has been considered in distinct landscape character zones in order to demonstrate the successful delivery of built form within a strong green infrastructure setting of Stonehaven and the wider countryside. Suggests a full landscape assessment of the southern SGA should be undertaken in the context of the newly opened AWPR, given the considerable impact that this has had, on the landscape character in this location.	Disagree. This is a visually sensitive site in a prominent coastal landscape, which merits its designation as an SLA. As such, regardless of the design of the proposal, it will still have some negative impacts on the landscape due to its headland location. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns – Stonehaven KN050	Requested reviewing the score for SEA Topic Material Assets regarding provision of new primary school and clarification is sought from the Council's Education Service on the replacement of Dunnottar Primary School, and if they were consulted on the PLDP.	The current preferred location of the replacement primary school is on land at Mackie Academy, and not on this site. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		Questioned why bid KN050 does not score more positively for SEA Topic Material Assets given that the SEA states Dunnottar Primary School is nearing capacity and the Settlement Statement identifies a new primary school as an aspiration. Highlighted that the Council have previously made approaches regarding the site for a replacement Dunnottar Primary.		the full assessment
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns – Stonehaven KN050	Agreed bid KN050 will have a positive effect on the SEA Topic Population by the delivery of a range of housing for all sectors of society. Noted this is particularly pertinent in the context of the Settlement Strategy which states that: 'a mix of house types is important to be maintained through future development and the inclusion of affordable housing is particularly important'.	Noted. No action required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns – Stonehaven KN050	Agreed bid KN050 will have a positive effect on SEA Topic Human Health as a result of development on this mixed-use site being located near the A90/92, town centre and within walking distance of local facilities.	Noted. No action required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1315	Site Assessment – Kincardine and Mearns – Stonehaven KN050	Amend the score on SEA Topic Cultural Heritage from negative to neutral. The two Category C (s) Listed Buildings on the site will be retained and protected and the setting to Cowie House (Category B) and associated boundary walls will be preserved. Added, the proposal seeks to respect the visibility of the site and through careful consideration of the scale, massing and orientation of the	Disagree. While the SEA acknowledges that existing screening and location of these historic assets, the design and mass of houses could affect the listed farmhouse. As such, the impact should remain as -/0. A detailed planning application	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		development it is considered that there would be no adverse effects on the Scheduled Monuments in close proximity to the site.	will confirm the likely impact. No change required.	
Stewart Milne Homes PP1316	Site Assessment – Kincardine and Mearns – Stonehaven KN051	Review the negative score given to SEA Topic Air for bid KN051, as this site is in a more sustainable location than the allocated sites. Acknowledged there will be an increase in traffic movements but the land for a new primary school creates a sustainable site that is more accessible to both existing and future residents.	Disagree. The scale and location of the site on top of a cliff makes direct access to the town centre less convenient. No new primary school is supported on this site at present.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1316	Site Assessment – Kincardine and Mearns – Stonehaven KN051	Agreed that bid KN051 will have a neutral effect on the water capacity and surrounding water courses.	Noted. No action required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1316	Site Assessment – Kincardine and Mearns – Stonehaven KN051	Amend the post mitigation score on SEA Topic Climatic Factors from negative/neutral to neutral, as the site is located within close proximity to public transport routes and the town centre, and is significantly more sustainable and accessible than other development opportunities in Stonehaven. As such, the post mitigation effect should be neutral.	Disagree. The scale and location of the site on top of a cliff makes direct access to the town centre less convenient. As such the site could have a negative or neutral score. It could also increase traffic and pollutants in Stonehaven. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1316	Site Assessment – Kincardine and Mearns –	Review the significant negative score given to SEA Topic Soil. Disagreed that bid KN051 will have a significant negative impact, as while it has prime agricultural land two allocated sites are on land identified as Grade 3.1 and it should be noted that	Disagree. Prime agricultural land is regarded as an important resource in the LDP, and it should only be developed upon in exceptional circumstances	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
	Stonehaven KN051	due to the size and shape of the site, it does not lend itself to modern farming practices. Therefore, this issue should not be significant enough to be a constraint to development. Noted that this has not been raised as a constraint to development in the Site Assessment for the 2016 MIR (Site KM043), through the LDP 2017 Report of Examination or within the Reporters consideration of the previous appeal on the Site (PPA-110-2317).	(e.g. in this case to meet the spatial strategy / /housing need). Also disagree that this land cannot be farmed, as fields along this coastline continue to be cultivated or grazed. No change required.	the full assessment
Stewart Milne Homes PP1316	Site Assessment – Kincardine and Mearns – Stonehaven KN051	Agreed that bid KN051 will have a positive effect on SEA Topic Biodiversity as there an opportunity to expand the green network through the proposed development.	Noted. No action required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1316	Site Assessment – Kincardine and Mearns – Stonehaven KN051	Questioned the reasoning behind bid KN051 scoring a negative/neutral effect in the SEA Topic Landscape, as the Council Officers have previously dismissed the site through the MIR due to the impact on the South East Coast Special Landscape Area (SLA). Suggested this appears to be less of a constraint on development. Added, the proposed development has been considered in distinct landscape character zones in order to demonstrate the successful delivery of built form within a strong green infrastructure setting of Stonehaven and the wider countryside. Suggested a full landscape assessment of the southern SGA should be undertaken in the context of the newly opened	Disagree. This is a visually sensitive site in a prominent coastal landscape, which merits its designation as an SLA. As such, regardless of the design of the proposal, it will still have some negative impacts on the landscape due to its headland location. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
		AWPR, given the considerable impact that this has had, on the landscape character in this location.		
Stewart Milne Homes PP1316	Site Assessment – Kincardine and Mearns – Stonehaven KN051	Review score for SEA Topic Material Assets regarding provision of new primary school. Questioned why bid KN051 does not score more positively for SEA Topic Material Assets given that the SEA states Dunnottar Primary School is nearing capacity and the Settlement Statement identifies a new primary school as an aspiration. Has also sought clarification of the Council's Education Service on the on the replacement of Dunnottar Primary School and if they were consulted on the PLDP.	The current preferred location of the replacement primary school is on land at Mackie Academy, and not on this site. No change required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1316	Site Assessment – Kincardine and Mearns – Stonehaven KN051	Agreed bid KN051 will have a positive effect on the SEA Topic Population by the delivery of a range of housing for all sectors of society. Noted this is particularly pertinent in the context of the Settlement Strategy which states that: 'a mix of house types is important to be maintained through future development and the inclusion of affordable housing is particularly important'.	Noted. No action required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes PP1316	Site Assessment – Kincardine and Mearns – Stonehaven KN051	Agreed bid KN051 will have a positive effect on SEA Topic Human Health as a result of development on this mixed-use site being located near the A90/92, town centre and within walking distance of local facilities.	Noted. No action required.	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of the full assessment
Stewart Milne Homes	Site Assessment – Kincardine and Mearns –	Amend the score on SEA Topic Cultural Heritage from negative to neutral, as the two Category C (s) Listed Buildings on the site will be retained and protected, and the setting to Cowie House	Disagree. While the SEA acknowledges that existing screening and location of these historic assets, the design and	Appendix 8.7, Table 8.7.5 and Kincardine and Mearns Annex of

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
PP1316	Stonehaven KN051	(Category B) and associated boundary walls will be preserved. Added, the proposal seeks to respect the visibility of the site and through careful consideration of the scale, massing and orientation of the development it is considered that there would be no adverse effects on the Scheduled Monuments in close proximity to the site.	mass of houses could affect the listed farmhouse. As such, the impact should remain as -/0. A detailed planning application will confirm the likely impact. No change required.	the full assessment
Historic Environment Scotland (PP1299 and PP1343)	Site Assessment – Marr – Alford OP4	HES noted that site OP4 in Alford is located within the Battle of Alford Inventory historic battlefield boundary (BTL 1) of 1645 and is located in the SE section of the Inventory boundary which is not presently considered to have been a key area of battlefield activity/lines of action, and therefore the potential impact on any archaeological remains dating to the battle is likely to be low. Nevertheless, this potential impact on the special qualities of the battlefield should still be assessed further, and although the allocation is located adjacent to existing housing development, given its size and change from what is currently an agricultural field, there is likely to be some impact on the understanding and appreciation of the battlefield landscape. Therefore, any potential impacts on key landscape characteristics and the cumulative impacts should be assessed, with mitigation and enhancement considered in line with HES Battlefield guidance.	Updated assessment of site OP4 in Alford to state that it is located within the Battle of Alford Inventory historic battlefield boundary, of 1645, in the southeast section. This area is not presently considered to have been a key area of battlefield activity/lines of action, but the potential impact on the special qualities of the battlefield should still be assessed. Although the allocation is located adjacent to existing housing development, given its size, there is likely to be some impact on the understanding and appreciation of the battlefield landscape. Therefore, any potential impacts on key landscape characteristics and the cumulative impacts should be assessed, with mitigation and	Appendix 8.7, Table 8.7.6 and Marr Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			enhancement considered in line with HES Battlefield guidance.	
Historic Environment Scotland (PP1299)	Site Assessment – Marr – Alford OP6	HES noted that site OP6 in Alford is located within the Battle of Alford Inventory historic battlefield boundary (BTL 1) of 1645 and is located in the central section of the Inventory boundary and some of the key areas of battlefield activity/lines of action are located to the NW and NE of it. Adds, although some development has already taken place within the allocation, there is the potential for archaeological remains dating to the battle to be uncovered and therefore this should be assessed further. Notes the allocation is fairly small in scale and located adjacent to small-scale development and a large area of forestry, but any potential impacts on key landscape characteristics and the cumulative impacts should be assessed and mitigation and enhancement considered in line with HES Battlefield guidance.	Updated assessment of site OP6 in Alford to state that this site is located within the centre of the Battle of Alford Inventory historic battlefield boundary of 1645 and includes a number of areas within it where fighting is said to have taken place. Some of the key areas of battlefield activity/lines of action are located to the NW and NE. Although some development has already taken place within the allocation, there is the potential for archaeological remains dating to the battle to be uncovered and therefore this should be assessed further. While the allocation is fairly small in scale and located adjacent to small-scale development and a large area of forestry, any potential impacts on key landscape characteristics and the cumulative impacts should be assessed and mitigation and enhancement considered in line with HES Battlefield guidance.	Appendix 8.7, Table 8.7.6 and Marr Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
SEPA (PP1299 and PP1344)	Site Assessment – Marr – Banchory R2	If this site is included before any groundwater assessment is undertaken, SEPA has requested amending the score for Water in Table 8.7.6 to -/?	Agreed. Change the Water score for site R2 to -/?.	Appendix 8.7, Table 8.7.6 and Marr Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Marr – Banchory R2	If this site is included before any groundwater assessment is undertaken, SEPA has requested amending the Comments and mitigation measures to, "Due to close proximity and likely hydraulic connectivity of the cemetery site to the River Dee, without a detailed groundwater assessment, the environmental impact on water factors are unknown."	Agreed. Amend the "Comments and mitigation measures" to "Due to close proximity and likely hydraulic connectivity of the cemetery site to the River Dee, without a detailed groundwater assessment, the environmental impact on water factors are unknown."	Appendix 8.7, Table 8.7.6 and Marr Annex of the full assessment
Frances Getliff PP0609	Site Assessment – Marr – Banchory OP2	The post mitigation score should be double (significantly) negative in terms of biodiversity. This area has a very high wildlife, landscape and recreational value, and is made up of a mosaic of semi - natural broadleaved woodland, mature Scots Pine and extensive small scale agricultural fields.	Site OP2 already scores significantly negative for biodiversity. The respondent appears to be referring to the environmental assessment of bid site MR039, which is adjacent to site OP2. This bid site is not allocated, and the SEA proposes development avoids woodland if it were allocated. No change is required.	Appendix 8.7, Table 8.7.6 and Marr Annex of the full assessment
Deeside Climate Action Network PP0804	Site Assessment – Marr – Banchory OP2	Has requested changing the post mitigation score for biodiversity from neutral to double negative, indicating a very poor outcome for the biodiversity of this block of land.	Site OP2 already scores significantly negative for biodiversity. The respondent appears to be referring to the environmental assessment of bid site MR039, which is adjacent to	Appendix 8.7, Table 8.7.6 and Marr Annex of the full assessment

Organisation	Issue	Summary of Comments	Our Response	Section of the Environmental Report
			site OP2. This bid site is not allocated, and the SEA proposes development avoids woodland if it were allocated. No change is required.	
SEPA (PP1299 and PP1344)	Site Assessment – Marr – Torphins R2	If this site is included before any groundwater assessment is undertaken, SEPA has requested amending the score in Table 8.7.6 Water column to - /?	Agreed. Changed the Water score for site R2 to -/?.	Appendix 8.7, Table 8.7.6 and Marr Annex of the full assessment
SEPA (PP1299 and PP1344)	Site Assessment – Marr – Torphins R2	If this site is included before any groundwater assessment is undertaken, SEPA has requested amending the Comments and mitigation measures to, "Due to close proximity and likely hydraulic connectivity of the cemetery site to the Beltie, without a detailed groundwater assessment, the environmental impact on water factors are unknown."	Agreed. Amended the "Comments and mitigation measures" to "Due to close proximity and likely hydraulic connectivity of the cemetery site to the Beltie, without a detailed groundwater assessment, the environmental impact on water factors are unknown."	Appendix 8.7, Table 8.7.6 and Marr Annex of the full assessment

6.3 The environmental report was amended to reflect recommendations by the Reporter following examination in public of the proposed LDP in 2022.

7. Reasons for Adopting the Local Development Plan

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

- The preferred options are more consistent with other relevant plans, policies and environmental protective objectives at international, national, regional and local levels than their alternatives. For example, they are consistent with the Scottish Planning Policy and Aberdeen City and Shire Strategic Development Plan 2020.
- They are less likely to have long-term irreversible significant effects on the environment.
- The negative effects within the preferred options are more likely to be easily mitigated than those within other alternatives considered.
- The assessment indicates that the preferred sites are more likely to have long-term positive effects than the alternative sites.
- The preferred options have more in-built protective policies than their alternatives.
- The alternative strategies and policies are less likely to be amenable to consultation outcome than the preferred options.
- The preferred options are more environmentally, socially and economically feasible to implement than the alternative options; as they promote sustainable development.

8. Monitoring Measures

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

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

Table 6: Monitoring Plan

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
Air quality	Reduction in nitrogen dioxide emissions Air quality (PM ₁₀)	Aberdeenshire Council <i>Local Air Quality Management: Progress Reports</i> LDP Monitoring of Objective 2 on integrated land use and transportation		When new Air Quality Management Areas are declared. Planning Applications. Review of the LDP.	Transportation and Infrastructure and Environmental Health Teams	Biennially. As part of the Air Quality Action Plan or as and when is necessary.	Review the development allocations.
Water quality	Improvement to water quality and maintain the ecological status of freshwater bodies in rivers and the coastline. Increase in the number and duration of bathing water areas passing Bathing water quality EC	SEPA (bathing and river water quality and abstraction rates of the River Dee) River Basin Management Plan (SEPA)		When the water quality of particular water bodies has not improved or suddenly deteriorates.	SEPA	Annually.	Review the Delivery Programme of the Local Development Plan. Review development allocations.

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
	Guideline Standards.						
Water quantity	<p>The extent to which water abstraction can support projected housing numbers.</p> <p>Compliance with abstraction licenses consented by SEPA.</p>	<p>SEPA (bathing and river water quality and abstraction rates of the River Dee)</p> <p>River Basin Management Plan (SEPA)</p>	<p>More information is needed on the long-term effects of climate change on the flow rates of the River Dee SAC.</p>	<p>When drought conditions suggest that water abstraction cannot cope with development.</p>	SEPA and Scottish Water	<p>As and when the Strategic Development Plan/its replacement is reviewed (sets housing numbers).</p>	<p>Review development allocations.</p>
Climatic factors	<p>Increase in resource use from new development, carbon footprint.</p>	<p>Aberdeenshire's Annual Climate Change Duties Report</p> <p>https://sustainablecotlandnetwork.org/reports/aberdeenshire-council</p>		<p>When planning applications are being approved contrary to Policies.</p>	<p>Planning and Economy Services (P&ES of Aberdeenshire Council (Planning Policy)</p>	<p>Annually.</p>	<p>Review of LDP and if mixed use developments are achieving desired outcomes.</p>

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
	<p>Increase in car use and energy consumption in new developments.</p> <p>GHG emissions.</p> <p>Increased levels of electric/hydrogen vehicle ownership.</p>	<p>Emissions data from Department for Environment Food and Rural Affairs (DEFRA) – this is regional information</p> <p>Local Transport Strategy</p> <p>Monitoring of modal shifts in transport modes – vehicle counts and cycle counts</p>		<p>When transport monitoring shows increases in congestion and a modal shift is not occurring, i.e. use of the car is increasing.</p> <p>When significant negative effects are noted in Environmental Assessments or other assessments and studies.</p> <p>When Emissions Report identify trends of concern.</p> <p>When car dependence is increasing.</p>	<p>Transportation Service of Aberdeenshire Council</p> <p>Local Transport Strategy Team</p>	Annual monitoring report.	Review Local Development Plan policies relating to transportation and land use allocations.
	Area at risk from flooding (pluvial, fluvial or tidal) and new developments at risk from flooding.	<p>Flood Prevention and Land Drainage (Scotland) Act 1997 Biennial Reports</p> <p>Shoreline Management Plan (once produced)</p>	More information is needed on the long-term effects of climate change on the flow	<p>When data indicates that there has been an increase in flood incidents action should be taken.</p> <p>When significant negative effects are noted in Environmental</p>	<p>Planning and Transportation Services of Aberdeenshire Council</p> <p>SEPA</p>		Review Local Development Plan policies and land use allocations.

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
		Flood risk Management Plans	rates of the River Dee SAC	Assessments or other assessments and studies.			
Soil	Remediation of contaminated land.	Aberdeenshire Council <i>Contaminated Land Strategy, Public Register of Contaminated Land</i> and GGP overlay: <i>Potentially contaminated sites</i> <i>Carbon-rich soils, deep peat and priority peatland habitats map consultation"</i> See http://www.snh.gov.uk/docs/A1495150.pdf		If the number of contaminated sites/land has not reduced annually.	P&ES of Aberdeenshire Council (Planning Information and Delivery)	Annually.	Review the Delivery Programmes of the Local Development plans. Review Local Development Plan policies.
	Soil erosion.	Flood monitoring data from SEPA		When flood events increase.	Planning and Transportation Services of Aberdeenshire Council SEPA	As and when.	Review Local Development Plan policies and land use allocations.

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
	Meeting Landfill Allowance Targets.	SEPA (quarterly Landfill Allowance Scheme)		If the level of Biodegradable Municipal Waste sent to landfill sites does not decline in accordance with the EC Landfill Directive.	SEPA	Annually.	Review the Delivery Programme of the Local Development Plan. Review LDP policies (on waste management facilities).
Biodiversity	Extent and quality of priority habitats. Distribution and status of protected species. Impact on the qualifying features of the River Dee SAC.	Dee Catchment Management Plan, survey and management proposals Aberdeenshire Council's Annual Monitoring Statement (LDP Policy E1) Regional Habitat Statements		Remedial action should be considered if water quality deteriorates or there is a decrease in water resource.	P&ES of Aberdeenshire Council (Planning Information and Delivery, Planning Policy, and (Environment Teams) NatureScot NESBReC Dee Catchment Partnership	Annually.	A review of land use allocations through the Local Development Plan process.

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
	<p>Number of and land area of designated sites.</p> <p>Number of biodiversity action plan species and habitats.</p>	<p>Aberdeenshire Council's annual monitoring statement (LDP Policy E1)</p> <p>Natural Heritage Strategy (in production)</p> <p>North East Scotland Biodiversity Action Plan</p>	<p>Yes - currently no regional LBAP; incomplete data on trends/ changes in habitats and species, and mapping of priority habitats.</p> <p>Resolution – allocate resources to NESBReC/ NELBP to produce state of Environment Report.</p>	<p>When proposals are supported as departures from Local Development Plan policies.</p> <p>When Nature Heritage Strategy indicates a negative impact on habitats and species as a result of development pressure.</p>	<p>P&ES of Aberdeenshire Council (Planning Information and Delivery, Planning Policy, and (Environment Teams)</p> <p>NatureScot</p> <p>NESBReC</p> <p>Dee Catchment Partnership</p>	Annually.	A review of land use allocations through the Local Development Plan process.
	Habitat fragmentation.	<p>Parks and Open Spaces Strategy</p> <p>Aberdeenshire Council's Annual Monitoring Statement (LDP Policies P2 and PR1)</p>		When Nature Heritage Strategy indicates a negative impact on habitats and species as a result of development pressure.	P&ES of Aberdeenshire Council (Planning Information and Delivery, Planning Policy, and (Environment Teams)		A review of the land use allocations and policies in the Local Development Plan, protecting open space,

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
					NatureScot NESBReC		and the Open Spaces Strategy.
Landscape	Impact of development on visually prominent areas. Development adversely affecting the landscape and townscape setting.	Aberdeen Landscape Capacity Study Public complaints Landscape character assessment and other landscape studies	Yes – these studies are infrequent and quickly out of date. There is no established monitoring programme. Solution: expertise - there are insufficient specialist skills in the local authorities to interpret data/ assessments of proposals.	When proposals are supported as departures from Local Development Plan policies. When landscape appraisal indicates a negative impact on landscape and townscape setting. When there is a large amount of opposition to development. When significant negative effects are noted in Environmental Assessments or other assessments and studies.	P&ES of Aberdeenshire Council (Planning Information and Delivery, Planning Policy, and Development Management) and Environment Teams	Annually.	Review Local Development Plan policies and land use allocations.
Material asset	Increase in the number of waste	Local Development Plan monitoring of Objective 4 on		When requirement set out in the North East Area Waste Plan are	Economic Development and Protected	Annually.	Review the Delivery

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
	management facilities built that address the need identified in the Area Waste Plan.	sustainable communities (SEPA, quarterly Landfill Allowance Scheme Data)		not being delivered in lower tier plans.	Services P&ES of Aberdeenshire Council (Planning Information and Delivery)		Programme of the LDP. Review the LDP land use allocations management facilities.
	School capacities.	School Roll Forecasts		Remedial action will have to be taken through the application process to take account of changes.	Education and Children's Services of Aberdeenshire Council	Annually in School Roll Forecasts.	Review the Delivery Programme of the LDP. Review the LDP land use allocations
	Increase and enhancement in the number of waste water treatment works and water works built.	Scottish Water SEPA		When land allocations are constrained.	P&ES of Aberdeenshire Council (Planning Information and Delivery)	Annually.	Review the Delivery Programme of the LDP. Review the Settlement Strategy and/or core objectives.

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
							Review the LDP policies and land use allocations.
	Decrease in waiting list figures for affordable housing.	Council housing waiting lists		When the waiting list figures for affordable housing remain static or increases.	Housing and Social Work of Aberdeenshire Council	Annually.	Review the Settlement Strategy and land use allocations. Review the LDP policies.
	Increase in redevelopment of brownfield sites.	Employment and Housing Land Audits Scottish Annual Vacant & Derelict Land Survey		When the amount of brownfield land remains static or increases.	P&ES of Aberdeenshire Council (Planning Information and Delivery)	Annually.	Review the Delivery Programme of the LDP. Review the Plan's policies and land use allocations.
	Energy efficiency of new homes.	Energy Efficiency Standards for Social Housing EESSH https://www.scottishhousingregulator.gov.uk/energy-efficiency-	Building Standards may have more information on the levels of efficiency	When proposals are supported as departures from LDP policies on sustainable development (LDP Policy C1).	Stock Improvement and Maintenance Team under Housing	Annually.	Review the core objectives.

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
		standard-social-housing-eessh	(bronze, silver etc).				Review the LDP policies.
Population	Increase in the range of house types and tenures.	Housing Land Audit (densities and completions) Monitoring of planning applications		When the development plan is reviewed.	P&ES of Aberdeenshire Council (Planning Information and Delivery)	Annually.	Review the Local Development Plan policies and land use allocations.
	Increase in the number of care homes built.	Monitoring of planning applications		When the Plan is reviewed.	P&ES of Aberdeenshire Council (Planning Information and Delivery)	Annually.	Review the Local Development Plan policies and land use allocations.
Human health	Number of people suffering from air borne diseases as a result of NO2 and PM ₁₀ , e.g. asthma.	NHS Grampian		When there is a substantial increase or high incidence of people suffering from air borne diseases.	NHS	Biennially.	For air quality actions as per effects on Air.

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
	Quantity and quality of open space.	Open Space Audit annual monitoring		Remedial action should be taken where there is a significant loss of open space as a result of new development.	P&ES of Aberdeenshire Council (Planning Policy Team)	Annually in Open Space Audit Monitoring.	Review LDP policies.
	Improvement to the issues highlighted in the Scottish Index of Multiple Deprivation affecting Aberdeen and Aberdeenshire.	Scottish Index of Multiple Deprivation		When the development plan is reviewed.	P&ES of Aberdeenshire Council (Planning Information and Delivery)	Annually	Review the Local Development Plan policies and land use allocations.
Cultural heritage	Impact on Archaeological remains on greenfield sites. Reduced numbers of historic buildings registered as 'at risk'.	Historic Environment Scotland Buildings at Risk Register for Scotland (website) Archaeology – number of excavations and remains found on sites		When planning applications are being approved contrary to Policies. When there is an increase in Archaeological remains being discovered. When the number of buildings on the 'at risk'	Historic Environment Scotland P&ES of Aberdeenshire Council (Planning Information and Delivery and	Annually.	Review the Local Development Plan policies and land use allocations.

Effects to be monitored	What sort of information is required? (Indicators)	Where can this information be obtained?	Are there gaps in the existing info and how can we resolve it?	When could remedial action be considered?	Who responsible for undertaking the monitoring?	How should the results be presented?	What remedial actions could be taken?
	The impact of development on listed buildings, conservation areas, battlefields, designed gardens.	Monitoring of planning applications		<p>register remains static or increases.</p> <p>When there is an increase in the number of listed buildings demolished.</p> <p>When significant negative effects are noted in Environmental Assessments or other assessments and studies.</p>	<p>Planning Policy Teams)</p> <p>Archaeology</p> <p>Developers</p>		

9. Conclusion

- 9.1 It is our conclusion that this SEA has had a positive effect on the development of the LDP. The SEA process has identified some possible negative effects on the environment; effects that were not anticipated at the start of the planning process. The process has, therefore, enabled mitigation measures to be devised to address negative effects incorporated into the Plan. With the incorporation of mitigation measures and ongoing monitoring of the significant effects of the LDP, it is considered that the proposals included in the LDP are the most suitable alternatives to allow for sustainable economic growth in Aberdeenshire in line with the requirements of the SDP and national policy. Through mitigation measures incorporated in the LDP these negative impacts will be prevented, reduced or compensated for whilst implementing the LDP.
- 9.2 Overall the environmental assessment has helped to guide our preference for development options and alternatives, and it has helped us to reword the LDP and clarify the main policy issues. The LDP will need to take account of these mitigation measures during its implementation. We believe the SEA process has significantly helped in developing a balanced LDP, and the Environment Report 2019 was a key consideration during the examination of the Proposed LDP in 2021. This, in turn, will ensure that future development will support economic growth, protect and enhance the environment including mitigation effects on climate and make improvements to the social wellbeing of the residents of Aberdeenshire.