ABERDEEN CITY COUNCIL

	Council
COMMITTEE	Council
DATE	13 December 2023
EXEMPT	No
CONFIDENTIAL	No
REPORT TITLE	Aberdeen Planning Guidance - Energy Transition Zone
	Draft Masterplan Consultation responses
REPORT NUMBER	COM/23/382
DIRECTOR	Gale Beattie
CHIEF OFFICER	David Dunne
REPORT AUTHOR	Laura Robertson
TERMS OF REFERENCE	21

1. PURPOSE OF REPORT

1.1 This report presents an updated Energy Transition Zone Masterplan, taking into account the findings of the eight week public consultation, and seeks agreement on the document becoming Aberdeen Planning Guidance to support the Aberdeen Local Development Plan 2023.

2. **RECOMMENDATIONS**

That Council:

- 2.1 Note the consultation responses received, and agree the changes proposed by officers to the Draft Energy Transition Zone Masterplan (Appendix 2).
- 2.2 Agree the content of the Energy Transition Zone Masterplan 2023, as amended, (Appendix 1) as non-statutory Aberdeen Planning Guidance to support the Aberdeen Local Development Plan 2023.

3. CURRENT SITUATION

3.1 The Aberdeen Local Development Plan (ALDP) 2023 was adopted on 16 June 2023. The ALDP 2023 contains Policy B5 - Energy Transition Zone, which identifies three areas of land allocated as OP56 (St Fittick's Park), OP61 (Doonies) and OP62 (Bay of Nigg / Gregness). The ALDP 2023 sets out that OP56 and OP61 will support renewable energy transition related industries in association with Aberdeen South Harbour, while OP62 largely relates to the Aberdeen South Harbour expansion. The ALDP 2023 also highlights the need for a joint Masterplan for all three of the sites. This is what the Energy Transition Zone (ETZ) Masterplan seeks to do, with the intention of becoming adopted by Aberdeen City Council as non-statutory Aberdeen Planning Guidance (APG). If adopted as APG, the Masterplan will be used by the Planning Authority in assessing any development proposals on the aforementioned sites. The ETZ Masterplan has been prepared by a consultant team on behalf of ETZ Ltd.

3.2 On 29 June 2023, the Draft ETZ Masterplan was reported to the Planning Development Management Committee to seek agreement for officers to carry out public consultation on the document.

The Committee agreed to:

- Endorse the content of the Draft Energy Transition Zone (ETZ) Masterplan;
- Instruct the Chief Officer Strategic Place Planning to, subject to any minor drafting changes, publish the Draft ETZ Masterplan for an eight week period instead of six weeks of non statutory public consultation;
- Instruct the Chief Officer Strategic Place Planning to report the outcomes of the public consultation and any proposed revisions to the Draft ETZ Masterplan to a subsequent Planning Development Management Committee within the next six months.
- 3.3 At Planning Development Management Committee on 21 September 2023, the following resolution of Full Council, of 11 September 2023, was submitted for consideration:

"To recommend to the Planning Development Management Committee that any future reports of the Energy Transition Zone (ETZ) Masterplan be reported to the earliest appropriate meeting of Full Council."

Committee resolved, following a division, to approve the resolution, and therefore agreed that any future reports on the ETZ Masterplan be reported to the earliest appropriate meeting of Full Council, hence the purpose of this report.

3.4 Appendix 1 contains the updated Energy Transition Zone Masterplan in a 'red text edit' version, whereby suggested changes to the previously considered document are highlighted in red for ease of reference. This red text, if the content is agreed, would be altered to black for final publication. A summary of the representations received, officers' responses to these representations, and details of any resulting action as a result of the consultation are contained in Appendix 2. Appendix 3 is the Habitats Regulations Assessment (HRA). Due their volume, full, un-summarised copies of representations are available in the members' share point site.

Background and the Draft Masterplan

- 3.5 The ETZ Masterplan (Appendix 1) has been prepared in accordance with the Council's 'Aberdeen Placemaking Process' Aberdeen Planning Guidance (formerly the 'Masterplanning Process'). The format and the content of the document is as follows:
 - Explains the strategic context and need;
 - Identifies the engagement and consultation that has taken place;
 - Looks at the study area and identifies land ownership, policy, existing communities and social demographics, environmental, biodiversity and landscape, landscape character, flood risk, cultural heritage, infrastructure,

development infrastructure and community infrastructure and local development considerations;

- Splits the document into campuses Community and Energy Coast, Marine Gateway, Hydrogen Campus, Offshore Wind Campus, Innovation Campus, Skills Campus; and
- Finally, it considers supporting infrastructure and Masterplan delivery.
- 3.6 Further detail on the background to the Draft Masterplan was provided within the report to the Planning Development Management Committee of 29th June 2023 and can be found via this link: <u>PLA.23.210 PDMC report</u>

Consultation Process

3.7 Consultation on the ETZ Masterplan has been undertaken by ETZ Ltd and their consultants on development of the document (and the subsequent Planning Applications), and by officers as part of the instruction by the Planning Development Management Committee to consult publicly on the content of the Draft Masterplan.

Consultation on ETZ Masterplan carried out by Ironside Farrar on behalf of ETZ Ltd

- 3.8 During the preparation of the Masterplan, ETZ Ltd and Ironside Farrar carried out stakeholder engagement over a number of months. Details of these events, including feedback and amendments, are set out within the 'Engagement & Consultation' section of the Masterplan (Appendix 1, pages 7 to 16). Specific engagement included:
 - Meeting with Torry Partnership and site walkover November 2021;
 - Public exhibition, December 2021;
 - Meeting with local GPs, February 2022;
 - Site walk about with members of the local community, April 2022;
 - Cove Community Council meeting and public exhibition, May 2022;
 - Public exhibition, November 2022;
 - Meeting with Lochside Academy teachers, August 2023, to consider future engagement opportunities;

A communications officer has also been appointed by ETZ Ltd to allow engagement to continue throughout the planning process.

- 3.9 Further to the consultation on the ETZ Masterplan, ETZ Ltd and Ironside Farrar also undertook pre-application public consultation prior to submitting an application for Planning Permission in Principle to the Planning Authority (validated on 1 November 2023). This consultation involved:
 - Event 1, held on 29 June 2023 at Torry United Free Church that 42 people attended. Although principally relating to the planning application, the event also included an update on the Masterplan process with a link to view the Draft Document and information on how comment could be provided to the Council's period of public consultation (discussed further below);
 - Event 2, held on 3rd August 2023 also at the Torry United Free Church;

Both events were advertised by ETZ Ltd and Ironside Farrar through a flyer drop to local households in the Torry, Balnagask and Cove areas (c. 9,000 households in total). The event was also publicised via email to all those who had attended previous Masterplan consultation events and left their contact details, as well as to a range of local community groups.

Draft Energy Transition Zone Masterplan Consultation by Aberdeen City Council Planning Authority

- 3.10 Following the instructions from Planning Development Management Committee on 29 June 2023, the Planning Authority undertook public consultation on the Draft ETZ Masterplan for eight weeks from 5 July 2023 until 30 August 2023. The eight week period reflected the consultation being undertaken over the summer holiday period. A half page, coloured newspaper article was published in the Evening Express on 5 July 2023 advertising the consultation, setting out where to find the material online and how comments could be submitted, including online, by email and letter.
- 3.11 The Draft Masterplan was publicly available and advertised as follows:
 - Paper copies of the document were available in 9 locations during their opening hours - Marischal College (main reception), Torry Library, Torry Medical Centre, Tullos Swimming Pool (reception), Kincorth Library, Cove Library, Cove Bay Medical Centre, North East Scotland College Altens Campus (reception) and Old Torry Community Centre.
 - The document was published on Aberdeen City Council's 'Consultation Hub -' <u>https://consultation.aberdeencity.gov.uk/</u>.
 - A notification email was issued to internal and external statutory consultees, including Community Councils, on 5 July 2023 to advise them of the consultation, with a reminder email sent on 9 August 2023.
 - The lead planning officer's email address was made available to consultees to allow direct correspondence to be submitted and for any queries on the Masterplan or consultation process to be answered.
- 3.12 A total of 641 responses were received during the consultation period. These can be broken down into 251 responses received online via the consultation hub (Citizen Space), 388 received by email and two by post. In analysing responses made via the online consultation hub we can tell that 112 of response made through the Citizen Space were local to the area and 81 were local to the wider Aberdeen area. Those that responded by email and post did not necessarily provide this information but those that did included a large number of AB postcodes.
- 3.13 The table below sets out a summary of the responses received on the Draft ETZ Masterplan, and responses by Officers to the points made. A more detailed summary is provided in Appendix 2:

Comment Received	Officer Response
Support the ETZ and its objectives and the move towards energy transition and away from oil and gas. Welcome working towards ensuring the achievement of Net Zero and climate change goals is key and ensure Aberdeen and the North East's position as the North Sea energy hub.	Comments noted
Impacts on essential road network during and post completion, including Coast Road, to ensure no further impact on residents. Some roads already difficult at peak times. Will cause traffic congestions, access and safety problems for residents and coast path users	 This level of detail is not required at Masterplanning stage. An assessment of traffic and transport impacts and other relevant studies will be required as part of planning applications as they come forward. The requirement for such studies is identified within the Masterplan on page 167. Each campus has a section on Transport and Connectivity shown the importance of this issue (p84, p108, p122, p132 and p144). Furthermore p 152 – 154 relates specifically to road infrastructure and how the ETZ relates to other existing and committed projects including the Aberdeen South Harbour Link Road.
Adversely affects those with disabilities, including the proposed alternative open space at Tullos hill. Will adversely affect the needs of people with disabilities due to the loss and diminution of quality of accessible and inclusive existing pathways in the park.	The proposal includes improved access through St Fittick's Park to Tullos Hill. It is noted that the bridge will be removed but this is a consequence of a separate project to electrify the main east coast rail line and upgrade the Coast Road and is consequently under the control of Network Rail. Careful consideration will be given to allowing improved access for all, through the assessment of planning applications. Further path networks and improvements are shown for each area but in particular on the Marine Gateway. Though part of the site will be developed, there will be an extensive path network still available.
Will negatively impact on environmental health due to increased levels of air, noise and light pollution and impact on health and wellbeing.	Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.

Comment Received	Officer Response
Results in loss of public amenities, green space and recreation ground. Will negatively impact the environment, realignment of the Tullos burn, children play provision, loss of wildlife etc.	At the centre of the ETZ masterplan is the consideration of environment, biodiversity and landscape. The community and energy coast considers the East Tullos Burn and wetlands (p59 and 60). St Fittick's park and the projects that will be brought forward in this area, to the benefit of the community are shown on pages 61-64. Biodiversity protection and enhancement are also considered on pages 65-66 with suggested improvements including pollinator coast, habitat management and development landscaping.
	It is acknowledged that around 1/3 of the site will be built on and alterations will be made to the burn at its easterly end but a number of further studies and assessments, including an EIA and flood risk assessment are required as part of ongoing planning processes and will be fully assessed and considered through this route.
	The Masterplan sets principles and parameters that will be taken forward with any planning applications. The environment, connectivity and community benefits, including a extended play park, pump park and parklets identified as part of the marine gateway are all embedded within the document highlighting their importance and requirement to be further considered.
	Furthermore, ACC carried out a Habitat Regulation Appraisal which considers the masterplan proposals against the Special Areas of Conservation and identified the mitigation required to avoid adverse impact on the designated sites and their qualifying species interests. These will be added to the Masterplan, as an appendix for clarity and the HRA made available for the Councils website.
Suggest development of Brownfield land in Altens and Tullos instead.	The ETZ will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Throughout, the masterplan states that brownfield land will be utilised. Examples within the masterplan are evident in the Innovation and Skills Campuses.
Lack of community consultation or listening to what the community want.	Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan (and summarised within this report). The main concerns raised by the community during consultation related to the allocation of the

Comment Received	Officer Response
	sites at St Fittick's and Doonies rather than community requirements or benefits.
	The allocation of the site is not for this Masterplan to consider, this was carried out via the Local Development Plan process (see paragraphs 3.15 and 3.16 below for explanation).
Masterplan does not fully acknowledge the impact on the park in terms of loss of amenity, including impact of lighting, loss of views and fences etc.	Detailed design and further assessments submitted with planning applications will consider the potential impact of elements such as light. This document sets out parameters and a framework for detailed proposals, but the design detail will be determined through the planning application process.
The masterplan should clearly show development constraints.	The site constraints are shown on plans from page 31 to 34 including flood risk and cultural heritage. There is also text throughout the document which considers opportunities and constraints of all campuses and areas, including p78 which talks about below ground Scottish Water infrastructure. This said the below ground infrastructure should be shown on a constraints plan along with any other similar constraints, making the document more useable. This has been updated in the Masterplan (also on page 78).
Concern with the height of the buildings.	The Masterplan sets parameters for development. Detail of building heights will be set out in subsequent planning applications, via studies such as Landscape and Visual Impact Assessments.
Concern with lack of information about uses.	At this time the end user is not known for the area. It is entirely appropriate for a Masterplan to provide this level of detail. The Masterplan sets principles and parameters that will be taken forward with any planning applications.
Insufficient compensatory replacement planting.	The Masterplan illustrates the location and area of landscaping that will be removed and replaced. Replacement planting will include native species and will extend woodland cover, particularly within the Tullos Wood.
	A section has also been added to the Masterplan stating: "development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover."

Comment Received	Officer Response
Concern with impact on heath in particular given Torry is a deprived area and that no Health Impact Assessment has been undertaken or requested.	A Health Impact Assessment will be provided as part of the planning application process.
Opportunity to enhance active travel in the area.	Such opportunities are included in the Masterplan and will be developed further as part of the planning application process. One of the Masterplan's strategic objectives is to deliver a green network for walking, cycling and enhanced community facilities.
Inconsistent and contrary to National and local planning policy, including Scottish Government policy to prioritise peoples' wellbeing and nature recovery.	The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ, the move to net zero and climate mitigation and adaptation.
Concern with these industrial uses in close proximity to housing.	Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.
Document is too high level, should not just be speculative development at St Fitticks.	The Masterplan sets principles and parameters that will be taken forward with any planning applications. Its objectives are to provide a series of strategic design and development principles to guide the most appropriate forms of development and uses for the area in accordance with the allocation. The design detail for each area will be determined through the planning application process.
Object to development of St Fittick's Park (OP56), loss of wildlife, amenity, biodiversity, loss of only greenspace left in Torry, impact on mental health, loss of wetland.	The Masterplan relates to land allocated in the ALDP for an ETZ. The masterplan has identified the developable area within the site, which equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60).
	The document sets out on page 167 the further assessments that are required for planning applications including an EIA.

Comment Received	Officer Response
	Furthermore, ACC carried out a Habitat Regulation Appraisal which considers the Masterplan proposals against the Special Areas of Conservation and identified the mitigation required to avoid adverse impact on the designated sites and their qualifying species interests. These will be added to the Masterplan for clarity and the HRA available for the Councils website.
Require all the relevant assessments to take place.	Noted, the Masterplan identifies a number of assessments as part of the planning application process.
Identify mitigation requirements more clearly.	The masterplan sets out phasing of applications and linked Strategic Mitigation & Compensation Measures (identified through Masterplan) on pages 158-172 of the draft Masterplan. It also states that planning obligations will be agreed with ACC through planning application assessment and as such will be secured through planning conditions and/or a legal agreement.
Some technical points and wording changes.	These have been addressed by the proposed updates to the Masterplan.
Development will impact on St Fittick's Church.	The impact on St Fitticks Church and Graveyard has been considered. Additional surveys and assessments will be required to ensure no physical damage is caused during development the setting of the church was altered a number of years ago. Historic Environment Scotland (HES) and the Council's archaeologist have been involved throughout the process. Further assessments and consultation with HES will be required as part of the planning process.

- 3.14 Of the emails received to the consultation, 365 were a duplicated standard response, requesting the removal of Opportunity Site 56 St Fittick's Park from the ETZ and that the draft Masterplan be amended accordingly. There have also been a number of representations requesting that Doonies (OP61) not be built on. In response to this point it is a matter of the principle of development on allocated ALDP 2023 sites:
- 3.15 Proposals for an ETZ at St Fittick's Park and Doonies first emerged in the Proposed Local Development Plan 2020 (PLDP) which was approved at Full Council on 2 March 2020. A public consultation was held on the PLDP from 20 May 2020 to 31 August 2020. The Council received 220 representations on the ETZ proposals at St Fittick's Park and Doonies. These were considered by independent reporters at an Examination who issued a Report into the Examination in September 2022. The Report recommended a number of additional requirements for a Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zones. Importantly however, the Report recommended retaining the proposals for Energy Transition Zones at OP56 St Fittick's Park

and OP61 Doonies/Gregness. The Council accepted all the Reporter's recommendations in December 2022 and the ALDP 2023 was formally adopted on 19th June 2023.

3.16 The principle of developing OP56 St Fittick's Park and OP61 Doonies for energy transition uses has therefore been accepted in the adopted ALDP 2023. However, the ALDP 2023 also requires a joint Masterplan for OP56 St Fittick's Park, OP61 Doonies and OP62 Aberdeen South Harbour and outlines some of the issues that need to be considered within the Masterplan. It is this Masterplan which is subject to the current consultation. If the Masterplan is approved, any development of the sites would then require planning consent. This will require planning applications which in turn will be open for further public scrutiny and comment.

Health Impact Assessment

3.17 There is currently no national or local guidance that sets out at what stage in the planning process, or by whom, a Health Impact Assessment should be carried out. In this case a Health Impact Assessment is required and has been requested by the Planning Authority to be considered as part of the planning application process.

4. FINANCIAL IMPLICATIONS

- 4.1 There are no financial implications associated with this report. The cost of preparing the ETZ Masterplan document has been met by ETZ Ltd and produced by Ironside Farrar on their behalf.
- 4.2 The Masterplan will front-load any planning issues and ultimately benefit future officer involvement and time in evaluating forthcoming planning applications should the final document go on to be adopted as non-statutory Aberdeen Planning Guidance.

5. LEGAL IMPLICATIONS

5.1 As a major landowner, proposals for the development of land and assets owned by Aberdeen City Council will, where applicable, be subject to assessment in line with the principles and standards set out in the Masterplan document.

6. ENVIRONMENTAL IMPLICATIONS

- 6.1 The Strategic Environmental Assessment carried out as part of the Aberdeen Local Development Plan preparation included the allocation of sites OP56, 61 and 62. Any future planning applications would be subject to an EIA screening process under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.
- 6.2 The Masterplan document is subject to Habitats Regulations Appraisal (HRA), in accordance with Conservation (Natural Habitats, & c.) Regulations 1994, the European Commission's Habitats Directive (Directive 92/43/EEC) (Natura 2000), and Birds Directive (79/409/EEC) respectively. In the light of the HRA, it is considered that the proposal will not adversely affect the integrity of any of

the protected sites or their qualifying interests, and that the conservation objectives will be met during and after construction as well as following implementation and delivery of the required mitigation measures. The Masterplan document has been updated to include the mitigations outlined in section 6b of the HRA.

6.3 As is standard process with HRA, it should be revisited through project level HRA once planning applications come forward to deliver the masterplan. A full Environmental Impact Assessment for the Planning Permission in Principle application for the ETZ proposals will also be required.

7. RISK

7.1 The assessment of risk contained within the table below is considered to be consistent with the Council's Risk Appetite Statement.

Category	Risks	Primary Controls/Control Actions to achieve Target Risk Level	*Target Risk Level (L, M or H) *taking into account controls/control actions	*Does Target Risk Level Match Appetite Set?
Strategic Risk	Not having an up-to- date Masterplan could result in longer timescales to manage and process planning applications for the area and affect the planning authority's obligation to determine applications within a set time period.	The document provides advice on what is required for the planning application process and land use requirements as well as any improvements and mitigation.	L	Yes
Compliance	These sites are allocated in the adopted Aberdeen Local Development Plan 2023. Not having an up-to-date Masterplan could result in longer timescales to manage and process planning applications for the area and affect the planning authority's obligation to determine applications within a	The document provides advice on what is required for the planning application process and land use requirements as well as any improvements and mitigation.	L	Yes

	and times marined it			
	set time period. It could also lead to inconsistent advice.			
Operational	By not providing guidance through an agreed Masterplan, officers could, over time, provide inconsistent advice.	The document provides clarity, consistency and certainly in terms of principles and site aspirations.	L	Yes
Financial	Not having guidance could lead to uncertainty at planning application stage, potentially leading to more staff time spent processing applications and a greater number of planning application appeals.	The document provides clarity, consistency and certainly in terms of what is required as part of the planning application process. It also identifies where mitigation and improvements are required and sets guidelines and principles for the whole area to ensure consistency and development	L	Yes
Reputational	Not considering guidance on a project that ACC own land within and is identified for development within the adopted Local Development Plan.	The Masterplan process is in place to inform the production of such documents as identified in the LDP.	L	Yes
Environment / Climate	Ensures that the Net Zero Route map is considered in the design of proposals. Noted that the environment of these areas will be altered.	The Masterplan document notes that proposals must consider energy use and emissions. It is also noted that the sites went through the necessary SEA process during consideration of the LDP and an	L	Yes

	HRA has been carried out. There is also the opportunity within the Masterplan to identify areas to help deliver biodiversity net gain.
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8. OUTCOMES

COUNCIL DELIVERY PLAN 2023-2024		
	Impact of Report	
Aberdeen City Council Policy Statement	The proposal within this report support the delivery of the following aspects of the policy statement: -	
Working in Partnership for Aberdeen	A Prosperous City – Work with partners to stimulate sustainable economic development, including a managed transition to a carbon neutral economy and work in partnership with the academic, business and other relevant sectors to ensure the long-term future of the energy industry.	
	Building a Greener and Sustainable City- Work with partners to deliver a just transition to net zero and plan to make Aberdeen a net-zero city by no later than 2037, and earlier if that is possible.	
Aberdeen City Local Outcome	e Improvement Plan 2016-26	
Prosperous Economy Stretch Outcomes Prosperous People Stretch Outcomes	The ETZ Masterplan states it "provides the basis for future development of energy transition industries, skills, innovation and investment in high-value manufacturing. It also focuses on the delivery of wider benefits in terms of job-creation, place-making, and the local environment." thereby supporting a ready supply of employment land which would result in job creation (Key Driver 2.1, 2.2). The Masterplan seeks to include and improve green spaces to support health and well-being of all ages (Key Driver 11.3).	
Prosperous Place Stretch Outcomes	Supports outcome 13 by aiming to create a globally recognised green energy cluster contributing to progress on the Net Zero Routemap.	

RegionalandCityStrategiesCity Strategies and StrategicPlans	Supports the Aberdeen Local Development Plan
	Net Zero Aberdeen Routemap Confirms that a just energy transition is a vital priority The ETZ Masterplan supports the Net Zero Aberdeen Routemap through the proposal of retrofitting and reuse of brownfield land and buildings as well as providing opportunities for net zero development and specialist co-located port activity. It also contributes to the Net Zero theme strategies of mobility, buildings and heat, circular economy, energy supply, our natural environment and empowerment.

9. IMPACT ASSESSMENTS

Assessment	Outcome
Integrated Impact Assessment	Completed
Data Protection Impact Assessment	Not Required
Other	Not Required

10. BACKGROUND PAPERS

- 10.1 Aberdeen Local Development Plan 2023. <u>https://www.aberdeencity.gov.uk/services/planning-and-building-</u> <u>standards/local-development-plan/aberdeen-local-development-plan</u>
- 10.2 Due their volume, full un-summarised copies of representations are available in on the Members' sharepoint

11. APPENDICES

- 11.1 Appendix 1 Draft Energy Transition Zone Masterplan.
- 11.2 Appendix 2- Summary of representations and officers' recommendations.
- 11.3 Appendix 3 Habitats Regulations Assessment (HRA)

12. REPORT AUTHOR CONTACT DETAILS

Name	Laura Robertson
Title	Senior Planner

Email Address	larobertson@aberdeencity.gov.uk
Tel	01224 067083