

Robert Forbes  
Planning Department  
Aberdeen City Council

Our Ref: 10165  
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By email only to: [pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk)

SEPA Email Contact:  
[planning.north@sepa.org.uk](mailto:planning.north@sepa.org.uk)

24 August 2023

Dear Robert

**Town and Country Planning (Scotland) Acts  
Redevelopment of vacant industrial site, including erection of 4 detached houses,  
associated garaging / car parking, pedestrian access paths, infrastructure and open space  
Scotstown Moor Base Shielhill Road Aberdeen AB23 8NN**

Thank you for consulting SEPA on 15 August 2023 in relation to the above application.

**Advice for the planning authority**

In line with the advice in the [Transitional Arrangements for National Planning Framework 4 letter](#) issued on 8 February 2023 our position and advice given below is based on NPF4 policy.

We have **no objection** to this application on the grounds of flood risk however please note our advice provided below.

**1. Flood risk**

- 1.1 The site is not shown to be at risk of flooding from the Burn of Mundurno, based on the SEPA Future Flood Maps. You can view the SEPA Flood Maps and find out more about them at [Flood Maps | SEPA](#). In addition, we hold no records of historical flooding at this site (although our records may be incomplete).
- 1.2 From map information we hold and the topographic levels illustrated on the Location & Site Plan (Drawing No. P-01 Aug 23), the general direction of drainage in this area is in a south-east to north-west direction. A "C" class road runs along the western site boundary and to the west/north-west of this road there is an area at risk of flooding from the Burn of Mundurno. But this site is elevated above the ground to the north-west, as shown on the Location & Site Plan, it is elevated by at least 1m above the ground immediately to the west of the adjacent road. Therefore, unless the planning authority have additional flood information available, we consider the development currently avoids the area at flood risk and will not increase flood risk elsewhere, therefore under NPF4 the principle of development at this location is acceptable on flood risk grounds.



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- 1.3 With regard to surface water drainage we consider water quantity aspects of surface water flooding to be under the remit of local authorities. The Flood Management Team or Roads / Engineering Team at Aberdeen City Council are likely to have greater local knowledge of the site and therefore, may be better placed to provide more detailed advice on this aspect.

## **2. Foul drainage**

- 2.1 We understand the site is to be served by a new private sewage treatment plant. This will require authorisation from us under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR). We recommend the applicant engage in pre-CAR application discussions with our Water Permitting Team ([waterpermitting@sepa.org.uk](mailto:waterpermitting@sepa.org.uk)) as soon as possible.
- 2.2 In line with our [SEPA triage framework: guidance for planning authorities and SEPA](#), we cannot guarantee whether consent for private foul drainage systems will be granted until the submission and determination of the relevant authorisation. We consider it to be at the applicant's commercial risk if planning permission is granted for a development/process which cannot gain authorisation from us, or if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising.

## **3. Other planning matters**

- 3.1 For all other planning matters, please see our [triage framework and standing advice](#) which are available on our website: [www.sepa.org.uk/environment/land/planning/](http://www.sepa.org.uk/environment/land/planning/).

## **Advice for the applicant**

## **4. Regulatory advice**

- 4.1 Details of regulatory requirements and good practice advice can be found on the [regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team at: [gs@sepa.org.uk](mailto:gs@sepa.org.uk)

If you have queries relating to this letter, please contact us at [planning.north@sepa.org.uk](mailto:planning.north@sepa.org.uk) including our reference number in the email subject.

Yours sincerely

Simon Watt  
Senior Planning Officer  
Planning Service

Ecody to: [rforbes@aberdeencity.gov.uk](mailto:rforbes@aberdeencity.gov.uk)

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