

Aberdeen Local Development Plan Habitats Regulations Appraisal Record

1. Introduction

In October 2005, the European Court of Justice ruled that land use-plans should be subject to a Habitats Regulations Appraisal according to Article 6(3) and 6(4) of the Habitats Directive (92/43/EEC) which applies to all development plans. This section assesses the likely significant effects that the Aberdeen Local Development Plan (ALDP) may have on the River Dee Special Area of Conservation (SAC) and the Moray Firth SAC. This report concludes that, subject to the safeguards in the Plan, the ALDP will have no adverse affect on the integrity of the European sites.

Approach Adopted for the Appraisal

The aim of the Appraisal is to assess the likely impacts of the ALDP against the conservation objectives of the River Dee SAC and the Moray Firth SAC. This is to ascertain that the Plan will not have an adverse impact alone, or in combination with the other plans and projects on the sites' integrity. A broad-brush approach was adopted to screen out aspects of the plan and policies that are not likely to have any significant effects on the River Dee SAC and Moray Firth SAC. The policies generally screened out do not generate any development, take land, cause pollution, require water abstraction, lead to any disturbance, and some protect the environment. In relation to the effects on the River Dee SAC, for aspects of the plan promoting development, we looked at development within and outwith 2km from the River Dee SAC while carrying out this assessment. The purpose of considering this 2km buffer is to ensure that all proposed developments likely to affect the River Dee SAC and its tributaries are included as a part of this assessment.

The Geographical Scope of the Plan

The ALDP covers the whole of the area of Aberdeen City Council. The ALDP sets out a spatial strategy for Aberdeen City and includes policies and proposals covering various issues including housing, transport, economic development, heritage, natural environment, retailing and urban design.

2. Background Information about European Sites

European Sites That May Be Affected

The ALDP may have affects the River Dee SAC and the Moray Firth SAC, In particular, for the Moray Firth SAC, it is the impact on the qualifying species: Bottlenose dolphin.

Qualifying Interests and Conservation Objectives of River Dee SAC

The Qualifying interests and the conservation objectives of the River Dee SAC are shown in Table 1 and those for the Moray Firth SAC are shown in Table 2. All the qualifying interests of the Moray Firth SAC have been set out in Table 2, but it is only the Bottlenose dolphin that is likely to be effected by the ALDP.

Table 1: Qualifying Interests and Conservation Objectives River Dee SAC

Site	Qualifying features/interests	Conservation objectives
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<p>River Dee (SAC) Designated 17/03/2005</p>	<p>Freshwater Pearl Mussel, Salmon, Otter</p>	<p>To avoid deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status (FCS) for each of the qualifying features.</p> <p>To ensure for the qualifying species that the following are maintained in the long term:</p> <ul style="list-style-type: none"> • Population of the species, (including range of genetic types for salmon), as a viable component of the site • Distribution of the species within site • Distribution and extent of habitats supporting the species • Structure, function and supporting processes of habitats supporting the species • No significant disturbance of the species • Distribution and viability of freshwater pearl mussel host species • Structure, function and supporting processes of habitats supporting freshwater pearl mussel host species
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Table 2: Qualifying Interests and Conservation Objectives of the Moray Firth SAC

Site	Qualifying features/interests	Conservation objectives
<p>Moray Firth (SAC) Designated 17/03/2005</p>	<p>Bottlenose Dolphin</p>	<p>To ensure for the qualifying species that the following are established then maintained in the long term:</p> <ul style="list-style-type: none"> • Population of the species as a viable component of the site • Distribution of the species within the site • Distribution and extent of habitats supporting the species • Structure, function and supporting process of habitats supporting the species • No significant disturbance of the species
	<p>Sandbanks which are slightly covered by sea water all the time</p>	<p>To ensure for the qualifying habitat that the following are maintained in the long term:</p> <ul style="list-style-type: none"> • Extent of habitat on sites • Distribution of the habitat within site • Structure and function of the habitat • Processes supporting the habitat • Distribution of typical species of the habitat • Viability of typical species as components of the habitat • No significant disturbance of typical species of the habitat

3. Screening

The following aspects of the ALDP would not be likely to have a significant effect alone on a European site for the reasons given.

Table 3: Aspects of the plan which would not be likely to have a significant effect on a European site alone

Aspects of the plan which would not be likely to have a significant effect on a European site alone	Relevant parts of the plan
General policy statements	Policy D3 Sustainable and Active Travel Masterplan Policies
Projects excluded from the appraisal because they are not proposals generated by this plan	None.
Policies which protect the natural environment, including biodiversity, or conserve the natural, built or historic environment	Policy D1 Architecture and Place Making Policy D2 Design and Amenity Policy D4 Aberdeen's Granite Heritage Policy D5 Built Heritage Policy D6 Landscape Policy NE1 Green Space Network Policy NE2 Green Belt Policy NE3 Urban Green Space Policy NE4 Open Space Provision in New Development Policy NE5 Trees and Woodland Policy NE8 Natural Heritage Policy NE10 Air Quality
Policies that will not lead to development or other change	Policy C2 City Centre Business Zone and Union Street Policy RT4 Local Shops Policy H4 Housing Mix Policy B15 Pipelines and Major Accident Hazards
Aspects of the plan which make provision for change but which could have no conceivable effect on a European site, because there is no link or pathway between them and the qualifying interests, or any effect would be a positive effect or would not otherwise undermine the conservation objectives for the site	Land Allocations outwith 2km of the River Dee SAC, See Appendix 3.
Aspects of the plan which make provision for change but which could have no significant effect on a European site, because any potential effects would be trivial, or 'de minimis' or so restricted that they would not undermine the conservation objectives for the site	Policy H8 Housing and Aberdeen Airport
Aspects which are too general so that it is not known where, when or how the aspect of the plan may be implemented, or where any potential effects may occur, or which European sites, if any, may be effected	Policy H5 Affordable Housing

A screening Matrix of policies and proposals in the plan 'in combination' with other aspects of the same plan, screened out individually in Table 3 above, and whether and how the effects of the plan in combination were or were not judged to be likely to be significant.

Plans and Projects Likely to Affect the Site

In assessing how the qualifying interests of the site are effected, consideration is given to the plan objectives as well as the objectives of other plans and projects with which ALDP is likely to have - "in combination" effects.

Aims and Objectives of the ALDP

The ALDP is the document that sets out the detailed guidance for new development in Aberdeen City up to 2023 with more indicative guidance for some areas up to 2030. This delivers the requirements from the Structure Plan, which requires housing allowances of 26,500 to 2023, and employment allowances of 105 hectares up to 2023. Strategic Reserve land is also identified for the period 2024 to 2030. Broadly the implementation of the ALDP will mean:

- Enabling developments to take place in Aberdeen in a managed and sustainable way. To facilitate partnership working through an ongoing process of engagement.
- Ensuring that appropriate physical and social infrastructure is provided in a timely fashion to support new development.
- Monitoring the rate at which new development is taking place and take appropriate action if identified targets for delivery are not being met.
- Providing a choice of new locations for employment land and seeks to strengthen the city's role as the major service centre in the North East of Scotland.
- Supporting the regeneration of disadvantaged areas of Aberdeen and providing opportunities for all its citizens.
- Creating quality lifestyles in quality settings through a series of detailed masterplans, which will investigate distinctive architectural styles, streetscape, urban form, and movement patterns.

In relation to the natural environment it will mean:

- Promoting and encouraging sustainable development, whilst sustaining the natural environment.
- Protecting and enhancing the unique green space areas of the city so they can be enjoyed by current and future generations.
- Creating a network of green spaces so everyone can enjoy the peace and tranquillity of informal outdoor pursuits.
- Complementing of Core Paths Plans to improve access and movement along the transport corridors and opening up many more opportunities for local people to enjoy the green space.
- Enhancing Green Space Network covering areas including River Valleys, the coast, woodland, District Wildlife Sites and Local Nature Reserves along with other valued landscapes. Investing to rejuvenate and revitalising them.

In relation to housing, it will mean:

- Improving affordable housing within Aberdeen City to increase access to housing for the wider population.
- Preventing town cramming and over-development of urban sites and supporting genuine city form and scale in urban sites.
- Providing a wide range of housing sites in Aberdeen to support the population.

In relation to transport, it will mean:

- Mitigating adverse traffic and transport impacts such as traffic congestion.
- Promoting road safety, access to vehicle, public car parking spaces and high demands of on-street parking.
- Ensuring that new developments are accessible to public transport.
- Reducing the need to travel by car by encouraging availability of alternative modes such as public transport, walking and cycling.
- Promoting the Western Peripheral Route (WPR) as a by-pass around the city to free up road capacity in the urban areas and providing opportunities for walking and cycling in the residential areas and pedestrian priority in the City Centre.
- Addressing problems associated with the Air Quality Management (Nitrogen Dioxide). Maintaining land around harbour and airport for their respective use.

In relation to the City Centre, it will mean:

- Promoting commercial, economic, social and cultural activities
- Providing modern business and commercial development opportunities and generating economic growth.
- Creating opportunities for speciality shopping and retailing.
- Developing and maintaining city centre as a major shopping destination, its use as a leisure, office, tourism and business. The Structure Plan sets a target of Aberdeen's City Centre becoming one of the top 25 retail locations in the UK.
- Retaining existing retail premises in retail use
- Boosting tourism and leisure facilities by developing cultural industry and generating social activities.
- Providing quality services such as hotels, guest houses, restaurants, bistros and car parking facilities.
- Increasing city centre population and mitigating conflicts in use and functions of the city centre.
- Improving the image of the City through strategic regeneration projects.
- Allowing non-car access through pedestrianisation of Union Street and improving the environment.
- Improving connections between new station developments, the harbour, Union Street and City Centre.

In relation to resources, it will mean:

- Tackling the shortage of permitted void landfill space within the city.
- Remediation of degraded and contaminated land for redevelopment.
- Reducing, reusing and recycling waste by carefully locating waste management facilities.
- Ensuring landfill sites and land raise proposals operate to the highest standards to reduce the impact on the environment.
- Providing waste management and proper storage facilities and access to such facilities.
- Developing economically and environmentally viable renewable energy resources.
- Increased energy efficiency of new developments.

In relation to Community Facilities, it will mean:

- Providing a wide range of facilities and enhancing overall quality of life.

- Providing opportunities for various community services such as schools health centres, hospitals, community centres, and libraries.
- Developing sports facilities, green spaces for new communities at convenient locations particularly accessible by public transport.
- Providing safe access and cycling facilities to encouraging people walk and ride and discouraging car use and reducing environmental impact.
- Generating employment opportunities by suitably locating sites for business development.
- Promoting a mix of housing, employment, retail, community facilities and open space in new developments.

In relation to retailing, it will mean:

- Developing retail opportunity sites for bulky goods.
- Creating good access and transport links for goods transportation.
- Supporting the vitality and viability of existing retail locations.

In relation to economic development, it will mean:

- Maintaining and promoting a strong and diverse economy by providing specialist business areas.
- Providing land for industrial, office and research and development uses.
- Developing facilities for science and technology related activities.
- Installing oil and gas infrastructure and developing the Harbour as a port.

Plans and Projects Considered “In Combination” with the ALDP

The Habitats Directive article 6(3) requires consideration of the implications of the ALDP for sites likely to be affected in combination with other plans and projects. The following Plans and Projects are considered that might – in combination with the ALDP – have a significant effect on the River Dee SAC and the Moray Firth SAC:

- Aberdeen City and Shire Structure Plan 2009
- Aberdeen City Local Plan 2008
- Aberdeenshire Local Plan 2006
- Aberdeenshire Local Development Plan (Proposed Plan Stage)
- Projects listed in Appendices Appendix 1 to Appendix 6.
- Aberdeen City Core Path Plan
- Aberdeenshire Core Path Plan
- Aberdeen City Local Transport Strategy
- Aberdeen City Local Housing Strategy
- Aberdeen City Sustainable Development Strategy
- Aberdeen Western Peripheral Route
- NESTRANS Regional Transport Strategy
- Aberdeen City Sports Strategy
- Aberdeen Offshore Windfarm

The key implications of the plans in combination with the Local Development Plan in are:

- The Structure Plan 2007-2030 identifies three strategic growth areas, which will be the main focus for development in the area up to 2030. The structure plan makes allowance for 72,000 new homes, of which, half will be located in Aberdeen, and for 175ha of employment land. The housing provision has been divided into 21,000

houses on Greenfield sites, 10,000 on brownfield sites and 5,000 within regeneration areas.

- Aberdeenshire Council are also working towards producing a Local Development Plan to address the Structure Plan requirements. The growth in Aberdeenshire is focused on the A90 north, A90 south and the A96. There is also a housing allowance for local needs growth outwith the transport corridors. Within Aberdeenshire there will be an allowance of sites for 36,000 houses.
- The Core Paths Plan proposes active use of paths and creation of new paths that could pass through or encourage the use of some sensitive sites.
- Aberdeen City Sports Strategy has water sports elements capable of disturbing conservation interests.
- Aberdeen City Local Transport Strategy, the Regional Transport Strategy and the Aberdeen Western Peripheral Route have development implications likely to affect Natura 2000 sites.
- Aberdeen City Housing Strategy proposes the development of over 1750 houses by 2011.
- Plans for offshore windfarms in the vicinity of the Aberdeen coastline and Aberdeen harbour have the potential to impact on Bottlenose dolphins.

Aspects of the Plan that would be likely to have a Significant Effect, Either Alone or in Combination

The implementation of the ALDP has the potential to impact on the qualifying features of River Dee SAC and the Moray Firth SAC. Below, Table 5, summaries the possible impacts that the ALDP policies and proposals will have on the qualifying interests of the River Dee or Moray Firth. Impacts on the Moray Firth have been focused to those on the Bottlenose Dolphin as it is not considered that the ALDP will have any effect on the qualifying habitat (sandbanks).

Table 5

Aspect of the Plan likely to have a significant effect	Qualifying interest of the European Site	Summary of the Likely Significant Effect
<p>LR1 Land Release</p>	<p>River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter</p>	<p>Water abstraction to support additional development may create conditions of low water flow. Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments Development in low lying areas and flood plains may be affected by climate change Disturbance to species (otter) and supporting habitats.</p>
	<p>Moray Firth SAC: Bottlenose dolphin</p>	<p>Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments Development in low lying areas and flood plains may be affected by climate change For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.</p>
<p>LR2 Delivery of Mixed Use Communities</p>	<p>River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter</p>	<p>Water abstraction to support additional development Increased in water demand, creating conditions of low water flow Water quality affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments Development in low lying areas and flood plains may be affected by climate change Disturbance to species (otter) and supporting habitats</p>
	<p>Moray Firth SAC: Bottlenose dolphin</p>	<p>Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments Development in low lying areas and flood plains may be affected by climate change For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.</p>
<p>I1 Infrastructure Delivery</p>	<p>River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter</p>	<p>Water abstraction to support additional development Water quality from soil deposition from constructional works Loss of habitat to development of facilities Disturbance to otter and salmon if facilities emitting light rays are located close to the SAC</p>
	<p>Moray Firth SAC: Bottlenose dolphin</p>	<p>Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments</p>

		<p>Development in low lying areas and flood plains may be affected by climate change</p> <p>For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.</p>
C1 City Centre Development	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	<p>Water abstraction to support additional development</p> <p>Water quality affected through run-off from constructional and infrastructural works; release of sediments and hazardous materials.</p>
	Moray Firth SAC: Bottlenose dolphin	<p>Possible impact on water quality in and around the harbour area as a result of development in the city centre.</p>
RT1 Sequential Approach and Retail Impact RT2 Out of Centre Proposals RT5 Retail Development Serving New Development	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	<p>Water abstraction to support additional development</p> <p>Water quality affected through run-off from constructional works.</p> <p>Loss of Habitat through morphological alterations, habitat modifications, habitat fragmentation, loss of bank side habitat</p>
	Moray Firth SAC: Bottlenose dolphin	<p>Water abstraction to support additional development</p> <p>Water quality affected through run-off from constructional works.</p>
H1 Residential Areas	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	<p>Water abstraction to support additional development</p> <p>Increased in water demand, creating conditions of low water flow</p> <p>Water quality affected through run-off from constructional works, diffuse and point pollution from land management and development.</p> <p>Loss of habitat to housing developments</p> <p>Development in low lying areas and flood plains may be affected by climate change</p> <p>Disturbance to species (otter) and supporting habitats. Development will increase density and development may have a greater impact on habitat areas.</p>
	Moray Firth SAC: Bottlenose dolphin	<p>Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development.</p> <p>Loss of habitat to housing developments</p> <p>Development in low lying areas and flood plains may be affected by climate change</p> <p>For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.</p>
H3 Density	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	<p>Water abstraction to support additional development</p> <p>Increased in water demand, creating conditions of low water flow</p> <p>Water quality affected through run-off from constructional works, diffuse and point pollution from land management and development.</p> <p>Loss of habitat to housing developments</p> <p>Development in low lying areas and flood plains may be affected by climate change</p>

		Disturbance to species (otter) and supporting habitats
	Moray Firth SAC: Bottlenose dolphin	Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments, this could be exacerbated by higher densities. For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.
H2 Mixed Use Areas	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water abstraction to support additional development Water quality affected through run-off from constructional and infrastructural works; release of sediments and hazardous materials.
	Moray Firth SAC: Bottlenose dolphin	Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments. For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.
H6 Gypsy and Traveller Caravan Sites H7 Gypsy and Traveller Requirements for New Residential Developments	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water quality affected through pollution from improper waste disposal
	Moray Firth SAC: Bottlenose dolphin	Possible Pollution on Dolphins as a result of pollution.
CF1 Existing Community Sites and Facilities CF2 New Community Facilities	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water abstraction to support additional development Water quality from soil deposition from constructional works Loss of habitat to development of facilities Disturbance to otter and salmon if facilities emitting light rays are located close to the SAC
	Moray Firth SAC: Bottlenose dolphin	Possible noise impact on Bottlenose dolphins if development takes place in coastal areas.
R1 Minerals	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water quality affected through soil erosion from site Potential impacts on supporting habitats Potential disturbance to species and supporting habitats
	Moray Firth SAC: Bottlenose dolphin	Mineral extraction, particularly in coastal areas has the potential to have impacts on bottlenose dolphins.
R2 Degraded and Contaminated Land	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Possible depending on type of redevelopment Water quality affected through accidental contaminant release in water run-off Dependent on type of restoration or redevelopment
	Moray Firth SAC: Bottlenose dolphin	Water quality affected through accidental contaminant release in water run-off Dependent on type of restoration or redevelopment
R3 New Waste Management Facilities	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	There is the possibility that energy generation from waste plants may use water Water quality affected through pollution from waste treatment facilities

R4 Sites For New Waste Management Facilities	Moray Firth SAC: Bottlenose dolphin	Possible pollution as a result of waste management facilities may affect bottlenose dolphins.
R5 Energy From Waste	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	There is the possibility that energy generation from waste plants may use water Water quality affected through pollution from waste treatment facilities
	Moray Firth SAC: Bottlenose dolphin	Possible pollution as a result of waste management facilities may affect bottlenose dolphins.
R6 Waste Management Requirements For New Development	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water quality affected through leakage of improperly stored waste
	Moray Firth SAC: Bottlenose dolphin	Possible pollution as a result of waste management facilities may affect bottlenose dolphins.
R7 Low and Zero Carbon Buildings	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Possible impacts on water quality if unsuitable technologies are located within close proximity or pathways to River Dee.
	Moray Firth SAC: Bottlenose dolphin	Possible pollution as a result of renewable technologies may affect bottlenose dolphins.
R8 Renewable and Low Carbon Energy Developments	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Yes; self-build houses and hydro schemes would have an impact on water flow Water quality affected through change in water flow, soil and sediment movement Loss of Habitat from soil resulting from heavy excavation and infrastructure development Disturbance to otter if development affects foraging resting and breeding sites. Potential for disturbance to qualifying species and supporting habitats from hydro schemes
	Moray Firth SAC: Bottlenose dolphin	Renewable energy developments may have potential pollution impacts, and if development results in noise, particularly offshore this may have a significant impact on Bottlenose dolphins.
NE9 Access and Informal Recreation	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water quality affected through soil and sediment deposition, eutrophication from dog fouling, Potential habitat loss through development of new recreational facilities Disturbance to all qualifying interests from water sports, and other recreational activities taking place within the foraging resting and breeding sites of otter outside the river.
	Moray Firth SAC: Bottlenose dolphin	No likely significant effect.
NE6 Flooding and Drainage NE7 Coastal Planning	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water quality affected through change in water flow, soil and sediment movement Loss of Habitat from soil and sediment deposition Coastal Squeeze from soil and sediment deposition Disturbance to seasonal migration of Atlantic Salmon at various stages of its life cycle.
	Moray Firth SAC: Bottlenose dolphin	Coastal Development has the potential to impact negatively on Bottlenose dolphins particularly noise impacts.
T1 Land for Transport	River Dee SAC: Freshwater	Water quality affected through soil and sediment deposition, waste disposal, and

	Pearl Mussel, Salmon, Otter	release of oil and fuel from infrastructural activities. Disturbance through activities associated with soil and sediment deposition, waste disposal, and release of oil and fuel from infrastructural activities. Specific impact on the River Dee SAC may result from the improved rail services, and in particular the section that crosses the River Dee.
	Moray Firth SAC: Bottlenose dolphin	Any transport development in coastal areas has the potential to impact negatively on Bottlenose dolphins particularly noise impacts
D3 Sustainable and Active Travel	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water quality affected through soil and sediment deposition, waste disposal, and release of oil and fuel from infrastructural activities. Disturbance through activities associated with soil and sediment deposition, waste disposal, and release of oil and fuel from infrastructural activities.
	Moray Firth SAC: Bottlenose dolphin	No likely significant effect.
T3 Managing the Transport Impact of Development	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water quality affected through engineering works, within the boundary of the SAC, for improving or developing infrastructure; and through the modification of river channel. Water quality affected through released chemicals, oil and fuel from roads and cars Habitat loss by engineering works; modification of river channel etc Disturbance through engineering works, within the boundary of the SAC, for improving or developing infrastructure; and through the modification of river channel. Disturbance from public transport access or vehicular access
	Moray Firth SAC: Bottlenose dolphin	Any transport development in coastal areas has the potential to impact negatively on Bottlenose dolphins particularly noise impacts
BI1 Business and Industrial Land BI2 Specialist Employment Area BI3 West End Office Area BI5 Pipelines and Major Accident Hazards	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water abstraction to support additional development Water quality affected through released contaminants from development of oil and gas infrastructure. Loss of Habitat through morphological alterations, habitat modifications, habitat fragmentation, loss of bank side habitat,
	Moray Firth SAC: Bottlenose dolphin	The development of business and industrial land in coastal areas has the potential to have a negative impact on Bottlenose dolphins. In particular if heavy industries locate in these areas the noise from the ongoing use may have a negative impact.
BI4 Aberdeen Airport and Aberdeen Harbour	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water abstraction to support additional development Water quality affected through soil and sediment deposition. Loss of habitat from bank side clearance Disturbance to qualifying features from constructional activities especially those that create significant underwater noise.
	Moray Firth SAC: Bottlenose dolphin	Developments in and around Aberdeen Harbour have the potential to significantly effect Bottlenose dolphins in and around the harbour area. Although there are no specific proposals for development, the support for the existing industries may lead to an increase in noise generating development. This policy may have a negative effect in combination with any offshore works, including offshore renewable energy

		developments.
Developments within 2km of the bank of River Dee (3,157 houses) See Appendix 1	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water abstraction to support additional development. Water quality affected through run-off from constructional works. Loss of habitat from bank side clearance and land take Potential for future requirements for flood defences and subsequent impacts on floodplain Disturbance to qualifying features from constructional activities. Development of OP134 Peterculter Burn has the potential to have likely significant effects on the River Dee SAC as it is adjacent to the Peterculter Burn which forms part of the River Dee SAC.
	Moray Firth SAC: Bottlenose dolphin	Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments Development in low lying areas and flood plains may be affected by climate change For developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.
Land Allocation on Greenfield Land – 20,674 homes	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water abstraction to support additional development. Water quality affected through run-off from constructional works. Loss of habitat from bankside clearance and land take Potential for future requirements for flood defences and subsequent impacts on floodplain Disturbance to qualifying features from constructional activities.
	Moray Firth SAC: Bottlenose dolphin	Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments Development in low lying areas and flood plains may be affected by climate change For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.
Land Allocation on Brownfield Land – between 5,880 and 9,477 homes	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	Water abstraction to support additional development if some of the proposed developments are outside regeneration areas or if new developments exceed demolished proportion. Water quality affected through run-off from constructional works. Loss of habitat from bank side clearance and land take No Potential for future requirements for flood defences and subsequent impacts on floodplain Disturbance to qualifying features from constructional activities
	Moray Firth SAC: Bottlenose dolphin	Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development. Loss of habitat to housing developments

Masterplanning of greenfield and brownfield allocations	River Dee SAC: Freshwater Pearl Mussel, Salmon, Otter	<p>Development in low lying areas and flood plains may be affected by climate change</p> <p>Water abstraction to support additional development if some of the proposed developments are outside regeneration areas or if new developments exceed demolished proportion.</p> <p>Water quality affected through run-off from constructional works.</p> <p>Loss of habitat from bank side clearance and land take</p> <p>No Potential for future requirements for flood defences and subsequent impacts on floodplain</p> <p>Disturbance to qualifying features from constructional activities</p>
	Moray Firth SAC: Bottlenose dolphin	<p>Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development.</p> <p>Loss of habitat to housing developments</p> <p>Development in low lying areas and flood plains may be affected by climate change</p>

Likely Significant Effects of ALDP in Combination with Other PPS

The implementation of ALDP is likely to have significant effects on the qualifying features of Dee SAC either alone or in combination with the plans listed above. Table 2 below summarises these effects.

Table 2: Likely significant effects of the plan in combination with other plans and projects

Qualifying Features	Key environmental conditions to support site integrity/ Sensitivities	Trends	Possible impacts arising from other plans and projects	Possible impacts arising from other Local Development Plans	Any risk of Significant effects?
River Dee					
<ul style="list-style-type: none"> • Atlantic Salmon (<i>Salmo salar</i>) • Freshwater Pearl Mussel (<i>Margarifera margarifera</i>) • Otter (<i>Lutra lutra</i>) • Bottlenose dolphins 	<ul style="list-style-type: none"> • Absence of disturbance to qualifying features such as Atlantic Salmon throughout its life cycle; particularly between November and May being the most sensitive months for Atlantic salmon • No natural or artificial barrier to the migration of Atlantic Salmon within its catchment from the river mouth to the headwater stream for spawning or to significantly impede adult migrating upstream and smolts migrating downstream • No actions to constrict watercourses; close by-pass routes and headroom; actions to reduce water velocity; or actions to erect permanent in-stream physical barrier to the movement of otters • Accessibility of the spawning area to adults • Availability of adequate holding areas to provide shelter • Sufficient summer flow to maintain adequate depth and velocity in juvenile rearing areas • Fresh water should avoidance high nutrient concentration, low dissolved oxygen levels, high sediment loads, heavy metals, mild or excessive eutrophication, toxic pollutants and pesticides, • Avoiding substrate gravel beds, cobble or boulders being clogged with sand and silt • Presence of a healthy population of salmonids (salmon, see trout and brown trout) is essential for pearl mussel. 	<p>Increasing pressure on water quality – nutrient loading as result of certain types of development Threat from climate change Pressure from development on river abstraction, promotion of economic development putting pressure on biodiversity and resource use Promotion of north-east as a tourist destination can be a source of disturbance for qualifying features.</p>	<ul style="list-style-type: none"> • Water Quality lowered • Water Abstraction lowering quantity of water • Coastal Squeeze Disturbance • Direct Habitat Loss • Increased pressure for water resources from River Dee likely to exacerbate conditions of low flow damaging the habitats and species it hosts 	<ul style="list-style-type: none"> • Water Quality lowered • Water Abstraction lowering quantity of water • Coastal Squeeze Disturbance • Direct Habitat Loss 	<p>Yes – there is a risk of significant effects on the qualifying features either alone or in combination with other plans and projects.</p>

Qualifying Features	Key environmental conditions to support site integrity/ Sensitivities	Trends	Possible impacts arising from other plans and projects	Possible impacts arising from other Local Development Plans	Any risk of Significant effects?
Moray Firth					
<ul style="list-style-type: none"> • Bottlenose dolphins 	<p>To ensure for Bottlenose dolphins that the following are established then maintained in the long term:</p> <ul style="list-style-type: none"> • Population of the species as a viable component of the site • Distribution of the species within the site • Distribution and extent of habitats supporting the species • Structure, function and supporting process of habitats supporting the species • No significant disturbance of the species 	<p>Increased pressure on species as a result of pollution. Engineering works that result in significant noise, specifically including proposals for offshore renewable technologies. Boating and shipping causing deterioration of dolphin populations.</p>	<ul style="list-style-type: none"> • Diffuse run-off pollution from agricultural practices • Excessive underwater noise causing disturbance to dolphin populations • Commercial effluent has potential to cause deterioration of dolphin populations • Sewage effluent has potential to cause deterioration of dolphin populations • Marine Litter • Activities involving nets have the potential to cause disturbance, injury and mortality. • Dredging and disposal of materials containing contaminants Offshore renewable energy developments have the potential to cause disturbance or injury. • Oil exploration has the potential to cause disturbance or deterioration of dolphin populations or their prey through oil related development and activities. • Impacts from boats and shipping and other motorised water sports. 	<ul style="list-style-type: none"> • Possible impact on coastal areas in Aberdeenshire. • Plans in Moray have the potential to have significant effect on Bottlenose dolphins. 	<p>Yes – there is a risk of significant effects on the qualifying features either alone or in combination with other plans and projects.</p>

Qualifying Features	Key environmental conditions to support site integrity/ Sensitivities	Trends	Possible impacts arising from other plans and projects	Possible impacts arising from other Local Development Plans	Any risk of Significant effects?
			<ul style="list-style-type: none">• Noise from low flying jets and helicopters.•		

4. Appropriate Assessment

Summary of Assessment of Likely Significant Effects

From the Screening exercise it has been identified that there is a risk that the significant effects identified may have an adverse effect on the integrity of the River Dee SAC and Moray Firth SAC for their qualifying features, either alone or in combination with other plans and projects.

It is Aberdeen City Council's obligation to either amend the plan or incorporate mitigation measures in consultation with Scottish Natural Heritage to ascertain that the ALDP would not adversely effect the integrity of either the River Dee SAC or Moray Firth SAC.

In the majority of cases developments that would lead to the most significant impact on the River Dee SAC and the Moray Firth SAC have been excluded from the ALDP. However, there remain some sites that could have significant effects and there is a requirement to incorporate mitigation measures for these within the ALDP.

There remain a large number of policies and proposals that may have a likely significant effect and a summary of all the measures taken to avoid impacts and the mitigation measures proposed, including site specific mitigation is set out in Table 6 below.

Table 6: Summary of Mitigation

Mitigation Measures Applied or Taken into Account in Assessment	Whether it Can be Ascertained that the Aspect of the Plan Would not Adversely Effect the Integrity of a European Site
What Has been Deleted/not included	
Greenfield proposals that formed part of the Main Issues Report that are adjacent to the River Dee and proposals on known pathways for the most part have been excluded. This included removal of a site at Loirsbank close to the River Dee. The only exception is site OP134 that is in close proximity to Peterculter Burn, which is a small proposal for 19 houses.	The exclusion of these sites does help to mitigate the effects of the ALDP on both the River Dee SAC and the Moray Firth SAC, but there remain proposals within 2km of the River Dee, and applying the precautionary principle, further mitigation is required, in particular further mitigation is required for Site OP134.
Developments that would impact on the coast and cause potential noise impacts on the Bottlenose Dolphins have not been included within the ALDP.	There is still the potential that Policy NE7 Coastal Development could allow for developments, not identified, that have a likely significant effect on the Bottlenose dolphins. Therefore, further mitigation is required.
Policy Measures Introduced	
Policy NE6 Flooding and Drainage has been amended to ensuring that appropriate SUDS are included within new developments promoted by he ALDP, this will avoid run-off and potential discharge of pollution into the River Dee and the coastal areas.	This will ensure that developments located on a pathway to the River Dee SAC will avoid run-off from the new development and avoid potential discharge of pollution into the River Dee.
Policy NE7 Coastal Planning does permit development in coastal areas in limited circumstances. The Local Development Plan has been amended to include an additional criterion to state "Development proposals will be required to demonstrate through appropriate marine-noise modelling, that adverse impacts on Bottlenose Dolphins and Atlantic Salmon are avoided"	This will ensure that there would be no adverse effect on Bottlenose Dolphins or Atlantic Salmon resulting from coastal developments.
Policy NE8 provides protection to natural heritage designations, and will ensure that any proposal	This will ensure that when assessing applications for planning permission an assessment of the

<p>for development will not be permitted unless steps are taken to mitigate negative development impacts. The Local Development Plan has been amended to include text to state that “The River Dee is a Special Area of Conservation (SAC) and includes that part of the harbour through which the river flows. This is the only Natura site within the Plan area. However, allocations within the plan area also have the potential to impact on the Bottlenose dolphin, a qualifying interest for the Moray Firth SAC and European Protected Species. These dolphins are frequently present offshore and at the mouth of the outer harbour.” The policy has also been amended to make specific reference to the requirement for appropriate assessment.</p>	<p>impact on the River Dee SAC and the Moray Firth SAC will be made and if required appropriate assessment would be undertaken, which will ensure that appropriate mitigation is incorporated to ensure that there is no adverse effect on the integrity of any either the River Dee SAC or the Moray Firth SAC.</p>
<p>Policy BI4 Aberdeen Airport and Aberdeen Harbour promotes development within these areas. Development at the Harbour has the potential to significantly effect the Bottlenose dolphins as a result of noise creation. The Local Development Plan has been amended to include text to state that “The masterplan will also include guidance on how to avoid adverse effects upon qualifying interests of the River Dee SAC which runs through the Harbour, and also upon Bottlenose dolphins, which frequently occur in the outer harbour and mouth, and are a qualifying feature of the Moray Firth SAC and a European Protected Species.”</p>	<p>This will ensure that when preparing a masterplan for the Harbour the potential impacts on the River Dee SAC and the Moray Firth SAC will be considered and if required appropriate assessment would be undertaken. Therefore, future plans for this area will not adversely effect the integrity of either the River Dee SAC or the Moray Firth SAC.</p>
<p>Case Specific Policy Restrictions</p>	
<p>Site OP134 Peterculter burn is adjacent to the River Dee SAC and is likely to have a significant effect. Within the ALDP site OP134 requires a Planning Brief that sets out a requirement that any proposal will need the agreement of a construction method statement that will avoid adverse effect on the qualifying interests of the River Dee SAC (Atlantic Salmon, Freshwater Pearl Mussel and Otter).</p>	<p>This will ensure that the development of site OP134 will make an assessment of the impact on the River Dee SAC and that there will be no adverse effect on the qualifying interests of the River Dee SAC during construction.</p>
<p>Policy T1 Land For Transport identifies a proposal for improved rail services, which includes rail services that cross the River Dee. To mitigate any likely significant effect the Action Programme will include the following text: “The detailed proposal will require a construction method statement that avoids an adverse effect upon the qualifying interests of the River Dee SAC (Atlantic Salmon, Freshwater Pearl Mussel and Otter). This will need to address the following:</p> <ol style="list-style-type: none"> 1. Impact of construction in proximity to watercourses (water crossings, soil storage, sediment release, timing and duration of works, pollution prevention, species survey) 2. Implications of flood events during construction for sediment release. 3. Details on drainage of allocated sites during construction. 4. Details of future monitoring of the qualifying interests potentially effected by this new infrastructure.” 	<p>This will ensure that if any projects for improved rail services come forward that development will make assessments of the impact on the River Dee SAC and that there will be no adverse effect on the qualifying interests of the River Dee SAC during construction. It will also ensure that the are monitoring arrangements in place.</p>

Habitats Regulation Assessment Conclusion

It has been identified that through a screening process that some ALDP proposals in combination with other plans and projects are likely to have significant effects on the qualifying interests of the River Dee SAC and Moray Firth SAC. These effects have been subject to a Habitats Regulation Appraisal in view of the sites' conservation objectives and addressed through policies in the document as well as through additional measures. Mitigation measures including amendments to policies and proposals have been introduced into the ALDP. Incorporating these mitigation measures ensures that the ALDP will have no adverse affect on the integrity of the River Dee SAC and the Moray Firth SAC. This conclusion does not rely on any lower tier plans, but will rely on appropriate assessment being undertaken in support of planning applications that are likely to have a significant effect on the integrity of the River Dee SAC and the Moray Firth SAC.

Habitats Regulation Appraisal Appendices

Appendix 1: Proposed Developments

The table below shows developments proposed within 2 kilometres of River Dee SAC. These are only the Greenfield sites that are included in the ALDP. Appendix 2 and 3 identify all the brownfield sites identified in the ALDP.

Site	Name of the Development	Development type	Area (ha)	No. of houses /flats	Approx. distance from SAC (metres)
Existing Sites from ALP					
OP57	Pinewood	Housing	10	150	2,000
OP51	Friarsfield / Morkeu	Housing, Access and junction improvements, riverside park	30	280	700
OP50	Earlswells House	Housing	0.7	10	1,700
OP74	Leggart Terrace	Housing	6.7	50	85
OP52	Hazledene	Housing	17	150	1,900
OP129	The Waterfront Old Torry	Mixed use	6.4	135	500
Sites from ALDP					
OP59	Peterculter East	Housing	2.1	25	220
OP62	Oldfold	Mixed use development (Housing and employment)	47	550	1,200
OP51	Friarsfield	Housing	15.8	50	1,300
OP65	North Garthdee Farm	Housing	2.8	80	510
OP77	Loirston	Mixed use development (Housing and employment)	128	1650	1,800
OP134	Peterculter Burn	Housing	7.4	19	0
OP135	Loirsbank	Housing	0.82	8	25
Total			274.72	3157	
Other Developments					
River Dee Valley		Improvement to path network			

Appendix 2: Brownfield Housing Sites within 2km of Dee SAC

Site	Site
OP82 – 140 Causewayend	OP99 – Denburn and Woolmanhill
OP83 – 35 Froghall Road	OP53 – Kennerty Mill
	OP103 – Frederick Street/East North Street
OP84 – 393-395 Great Western Road	OP55 - Milltimber Primary School
OP85 – 41 Nelson Street	
OP87 – Aberdeen College, Gallowgate	OP111 – Nazareth House
OP47 – Braeside Infant School	OP114 – Pittodrie Park
OP90 – Broadford Works	OP123 – Triple Kirks
OP93 – Causewayend Primary School	OP125 – Urquhart Road Works
OP92 – Citadel	OP126 – Victoria House
OP73 – Craighill Primary School, Kincorth	OP127 – Victoria Road School
OP97 – Crown House	OP128 – VSA Gallowgate
OP49 – Cults Pumping Station	OP130 – Water Lane Grannary

Appendix 3: Brownfield Housing Sites Outwith 2km Dee SAC

Site	Site
OP81 – 1 Western Road	OP37 - Greenfern Infant School
OP86 – 82-88 Middlefield Place	OP105 – Hillhead Halls
OP9 - Aberdeen College, Gordon Centre	
OP88 – Aberdon House	OP106 – Hilton Nursery School
OP7 - Balgownie Centre	OP108 – Kittybrewster Depot
OP89 – Balgownie Machine Centre	OP109 – Linksfield Academy (part)
OP8 - Balgownie Primary	OP21 - Manor Walk
OP15 – Bankhead Academy	OP34 - Marchburn Infant School
OP16 – BP Dyce	OP110 – Mile End Primary
OP36 – Byron Park Nursery & Infant School	OP22 - Mugiemoos Mill
OP91 – Cattofield Reservoir	OP112 – Oakbank School
OP94 – Cornhill Hospital	OP113 – Park House, Westburn Rd.
OP96 – Croft House	OP116 – Smithfield School
OP100 – Donside Paper Mill	OP117 – St Machar Primary School
OP101 – Dunbar Halls	OP119 – St Peter’s Nursery, Spital
OP18 – Farburn Terrace Dyce	OP23 - Stoneywood Terrace
OP120 – Former Summerhill Academy	OP121 – Tillydrone Primary School
OP17 – Former Carden School	OP38 - Woodend Hospital Annex
OP104 – Froghall Terrace	OP131 – Woodside Congregational Church

Appendix 4: Sites Remaining from ALP Outwith 2km of Dee SAC

Site Reference	Comments	Allocation	Masterplan
OP11 Jesmond Drive	This site is greenfield and will contribute to the requirements of the structure plan.	85 homes	No masterplan required Mix of uses Adjacent open space Affordable housing
OP20 Hopcroft	This is an opportunity to provide housing near to an area where employment uses predominate.	30 homes	Planning Brief Access and junction improvements Affordable housing
OP39 Greenferns	This area could probably accommodate most development in road infrastructure terms prior to the construction of the WPR. There are a range of potential routes into the City, including extending Provost Rust and Provost Fraser Drives and the Lang Stracht, and high frequency public transport routes could be easily extended. Development could present regeneration opportunities.	120 homes	Masterplan for Greenferns 5ha reserved for primary school Community woodland Access to community woodland Contribution to improvements to Sheddocksley playing pitches Access, junction and public transport improvements, including the extension of bus services into the area Affordable housing 0.5ha reserved for a recycling centre.
Old Skene Road	This site is greenfield and will contribute to the requirements of the structure plan.	25 homes	No masterplan required Affordable housing.
OP75 Stationfields, Cove	This site should be tied into a new Cove Masterplan. It lies beside the relatively un-congested coast road.	150 homes	Masterplan for Cove Reserve land for a railway station Access and junction improvements Affordable housing National Cycle Route should not be adversely affected by development.

Appendix 5: All ALDP Greenfield Housing Land Allocations

Site	Housing Allocation	Preferred Option
OP25 Dubford	550	Phase 1 – 550
OP10 East Woodcroft North	60	Phase 1 – 60
OP12 Grandhome / Whitestripes	7000	Phase 1 – 2600 Phase 2 – 2100 Phase 3 – 2300
OP24 Stoneywood	500	Phase 1 – 500
OP29 Craibstone South	1000	Phase 1 – 750 Phase 2 - 250
OP30 Rowett South	1940	Phase 1 – 1000 Phase 2 – 700 Phase 3 – 240
OP31 Greenferns Landward	1500	Phase 1 – 750 Phase 2 – 250 Phase 3 – 500
OP135 Woodside	300	Phase 1 – 300

OP42 Kingswells D and West Huxterstone	120	Phase 1 – 120
OP41 Kingswells C	50	Phase 1 – 50
OP45 Greenferns Strategic Housing Land Reserve	1500	Phase 1 – 750 Phase 2 – 350 Phase 3 – 400
OP43 Maidencraig South East	450	Phase 1 – 450
OP44 Maidencraig North East	300	Phase 1 – 300
OP62 Oldfold	550	Phase 1 – 500 Phase 2 – 50
OP61 Edgehill Road	5	Phase 1 – 5
OP60 Culter House Road	5	Phase 1 – 5
OP59 Peterculter East Site 2	25	Phase 1 – 25
OP51 Friarsfield	50	Phase 1 – 0 Phase 2 – 50
OP64 Craigton Road/Airyhall Road	20	Phase 1 – 20
OP58 Countesswells	3000	Phase 1 – 2150 Phase 2 – 850
OP65 North Garthdee Farm	80	Phase 1 – 80
OP77 Loirston	1650	Phase 1 – 1250 Phase 2 – 400
OP134 Peterculter Burn	19	Phase 1 – 19
TOTALS	20,674	Phase 1 – 12,234 Phase 2 – 5,000 Phase 3 – 3,440

Appendix 6: All Greenfield ALDP Employment Land Allocations

Site	Ha	Notes
Employment Land Allocations to 2023		
OP12 Whitestripes (part of larger mixed use proposal)	5	A small employment area should be provided as part of the proposal at Whitestripes.
OP26 Craibstone North and Walton Farm	1.5	A small area of undeveloped land which could be incorporated into the Dyce Drive employment area.
OP28 Rowett North	34.5	With the Rowett area being surplus to requirements, this area could be re-zoned for employment uses.
OP40 West Hatton and Home Farm, Kingswells	50	Development contains three areas: 1. The larger scheme proposed would be bisected by the AWPR. Restricting the allocation to the east of the road would still allow a release of approximately 12ha which should be masterplanned alongside proposals at Home Farm 2. This should be considered for employment use only alongside 3/01 and 3/13 3. Next to the park and ride, but issues related to the consumption dykes would need to be overcome.
OP45 Greenferns SHLR (part of larger mixed use proposal)	10	An employment area should be provided as part of the proposals at Greenferns SHLR, which should support the regeneration of the wider area.

OP46 East Arnhall	1	Small Employment site within Aberdeen that would form part of a larger employment development in Aberdeenshire.
OP58 Countesswells	10	An employment area should be provided as part of the proposals at Countesswells.
OP62 Oldfold (part of larger mixed use proposal)	5	An employment area should be provided as part of the Oldfold expansion at Milltimber. There is currently no employment land in lower Deeside.
OP77 Loirston (part of larger mixed use proposal)	11	An employment area should be provided as part of the proposals at Loirston.
TOTAL	128	The structure plan requirement is for allocations of 105ha to be identified for the period up to 2023.

Strategic Reserve Employment Land

OP2 Murcar	27	Murcar
OP26 Craibstone North and Walton Farm	18.5	An area of land to the north of the A96 which could be incorporated into the Dyce Drive employment area.
OP78 Charlestown	20.5	Could be released after proposals at Loirston and Aberdeen Gateway are developed. Access issues would need to be addressed.
Total	66	The Structure Plan requirement is for 70 hectares to be identified as strategic reserve employment land to be identified up to the period 2030.

