



Scott Leitch
Strategic Place Planning
Aberdeen City Council
Business Hub 4
Marischal College
Broad Street
Aberdeen
AB10 1AB

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SENT VIA EMAIL ONLY
sleitch@aberdeencity.gov.uk
pi@aberdeencity.gov.uk

Dear Scott

ABERDEEN BEACHFRONT MASTERPLAN

ENVIRONMENTAL IMPACT ASSESSMENT SCREENING OPINION REQUEST

Keppie Design, acting on behalf of Aberdeen City Council, today write regarding the subject development proposals at Aberdeen Beachfront and surrounding area. As you are aware, a Beachfront Projects Feasibility Report was presented to the City Growth and Resources Committee on 25th August 2021. This presented a number of development options relating to a Beachfront Masterplan, the Beach Ballroom, Leisure and Stadium facilities and Public Realm/Landscape.

While the preferred development option(s) have yet to be confirmed, our client seeks a Screening Opinion from Aberdeen City Council as to whether the development would be considered to require an Environmental Impact Assessment (EIA). As such, this request for a Screening Opinion sets out what might be considered to be the maximum quantum of development suggested in the 25th August Feasibility Report. As set out by this letter, it is considered that the proposals are not of a scale or within a location that would constitute them being considered EIA development, and therefore we are of the opinion that an Environmental Statement is not required – albeit it is proposed that a number of individual assessments would be submitted with any associated planning applications in the future.

Summary of Proposals

It is anticipated that an application for Planning Permission in Principle will be submitted for the masterplan-led redevelopment of the Aberdeen Beachfront encompassing land at the Kings Links, Queens Links, Esplanade and the Beach Boulevard. As per the enclosed Location Plan, the site boundary covers an area of over 50 hectares, however the areas of notable built development will be concentrated at Kings Links, Queen's Links and the Beachfront. As above, a

number of Masterplan and development options are being considered by the Council, however, for the purposes of this Screening Request, the anticipated maximum quantum of development is described below to allow a proper assessment. This encompasses:

- Beach Ballroom – refurbishment of existing Ballroom with potential minor extension/break out space and associated public realm;
- Leisure/Sports – up to 11,000m² Ice Rink and 11,680m² Leisure/Sports plus the potential additional Leisure development of c 25,700m² (potential total of 48,380m² of Leisure/Sports space, which includes repurposing or redevelopment of existing ice/Sports facilities at Kings Links);
- Stadium – 18-20,000-seater / 20,000 m² gfa stadium (e.g. relocation/reprovision of existing stadium c400m away);
- Public Realm – urban park/play park, amphitheatre etc with associated landscaping/public realm on existing open space at Queen’s Links;
- Beachfront / Esplanade – Upgrade/redesign of existing public realm and connections;
- Pier structure (up to c120m projection from beach walkway / c160m from Esplanade – the structure is not anticipated to project into Special Protection Area);
- Beach Boulevard – upgrades to road/active travel connections to/from the city centre including public realm interventions.

Attached to this Screening Request are Appendices B, C and D of the Beachfront Projects Feasibility Report which relate to the Beach Ballroom, Masterplan and Leisure/Stadium respectively.

Background

Schedule 1 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 confirms the types of development which require to be accompanied by an EIA. Schedule 2 determines those which require further screening to determine whether such assessment is necessary. It is considered that the development does not fall into a description of development contained within Schedule 1.

The proposals are for the masterplan-led redevelopment of the Aberdeen Beachfront area across a wide site area. For this reason, the development is considered to fall into Cat.10 ‘Infrastructure projects’ of Schedule 2, namely development described as:

- b) *‘Urban development projects, including the construction of shopping centres and car parks, sport stadiums, leisure centres and multiplex cinemas;’*

The applicable thresholds and criteria for the purposes of classifying development as Schedule 2 in this case are stated as:

‘The area of the development exceeds 0.5 hectare.’

As the proposed masterplan area meets the above Schedule 2 description and requirements for screening, the below sets out the necessary information to allow the Council to provide a Screening Opinion.

Request for a Screening Opinion

Regulation 8(2) sets out the information required to accompany a request for the Planning Authority to adopt a screening opinion. This information comprises the following, which is detailed thereafter:

- a) *a description of the location of the development, including a plan sufficient to identify the land;*
- b) *a description of the proposed development, including in particular—*
 - i. *a description of the physical characteristics of the proposed development and, where relevant, of demolition works;*
 - ii. *a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;*
- c) *a description of the aspects of the environment likely to be significantly affected by the proposed development; and*
- d) *a description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—*
 - i. *the expected residues and emissions and the production of waste, where relevant;*
 - ii. *the use of natural resources, in particular soil, land, water and biodiversity.*

The following sets out the Applicant's response to the Regulation 8(2) criteria, with reference to 8(4), which states that:

- 8(4) The information referred to in paragraph (2) is to be compiled taking into account, where relevant—*
- a) *the selection criteria set out in schedule 3; and*
 - b) *the available results of any relevant assessment.*

The following responses have been prepared with reference to the criteria set out in Schedule 3 'Selection Criteria for Screening Schedule 2 Development'.

a) Description of the location of the development, including a plan sufficient to identify the land

The proposal site is located to the northeast of Aberdeen City Centre along an approx. 1km stretch of the Aberdeen Beachfront. The site area itself covers more than 50ha and is illustrated by the accompanying Location Plan. The existing and approved land uses include the existing sports and leisure facilities (ice rink, leisure centre, cricket grounds and the Kings Links Golf Centre) at the King's Links, the Beach Ballroom venue, and the open recreational grounds at Broadhill and Queen's Links (including play park). As such there are no, or very limited, residential uses on or within close proximity of the areas of any proposed notable development, with only residential properties lining the Beach Boulevard.

Given that the proposals are for largely similar land uses as those existing; it is considered that the development in general will have a largely neutral effect upon the regenerative capacity of natural resources. The site is not known to be identified as an area in which there has been a failure to meet environmental quality standards. There are no European sites or other protected sites within the site boundary. To the north of the site is the 'Donmouth Local Nature Reserve'; to the east, off the coast, is the 'Ythan Estuary, Sands of Forvie and Meikle Loch' Special Protection Area (SPA); and to the South of the site is the River Dee Special Area of Conservation (SAC). There is considered to be sufficient separation between the proposals and the Donmouth Nature Reserve (1.3km+) and the River Dee Special Areas of Conservation (1.2km+). There

is considered to be limited potential for adverse impacts upon the 'Ythan Estuary' SPA due to the limited physical interaction with this area, with the potential Pier being the only element of the proposals that may come within proximity of this area, albeit it will not project into the SPA. Although a coastal location, the use is compliant, and there is abundant and available coastal land to north and south. The surrounding landscape is not of any notable historical or archaeological significance, but arguably has cultural significance.

Ultimately, the location of the development is in an area that already accommodates sport, leisure and recreational activity at the Kings Links, Queens Links and Beachfront areas, including the existing Pittodrie Stadium immediately adjacent the site boundary, just c400m away from the proposed Kings Links location.

(b) a description of the proposed development

As above, a number of Masterplan and development options are being considered by the Council, however, for the purposes of this Screening Request, the anticipated maximum quantum of development is described below to allow a proper assessment. This encompasses:

- Beach Ballroom – refurbishment of existing Ballroom with potential minor extension/break out space and associated public realm;
- Leisure/Sports – up to 11,000m² Ice Rink and 11,680m² Leisure/Sports plus the potential additional Leisure development of c 25,700m² (potential total of 48,380m² of Leisure/Sports space, which includes repurposing or redevelopment of existing ice/Sports facilities at Kings Links);
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As noted, the proposed development shall retain or redevelop existing uses currently within the site boundary, most notably the sport and leisure development aspects. Indeed, while a stadium would strictly be a new development not within the site boundary, the existing Pittodrie stadium sits immediately adjacent the site, only c400m away from the potential location at the Kings Links. As such, it is considered that there will be no notably detrimental cumulation with other existing and/or approved development. Essentially, the proposals could be considered a 'recalibration' of existing development within the wider area, as opposed to the introduction of new development to the site.

The characteristics of the proposals with regard to use of natural resources, production of waste, pollution and nuisances, major accident risk or risk to human health are all comparable to those currently existing on the site.

c) a description of the aspects of the environment likely to be significantly affected by the proposed development; and
and

d) a description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—

- i) the expected residues and emissions and the production of waste, where relevant;
- ii) the use of natural resources, in particular soil, land, water and biodiversity.

With regards to any impact of development on the environment arising from the proposed development, Circular 1/2017 provides guidance as to how such impacts can be understood, and notes that the basic question to be asked is ‘*Would this particular development be likely to have significant effects on the environment?*’. It should also be noted that the selection criteria contained within Schedule 3 of the regulations sets out (under the headings of ‘characteristics of development’, ‘location of development’ and ‘characteristics of potential impact’) criteria which should factor into any assessment by the local authority of a development’s impacts. Circular 1/2017 establishes that:

‘Consideration of the third of these categories is designed to help in determining whether any interactions between the first two categories (i.e. between a development and its environment) are likely to be significant. Planning authorities may wish to consider using some form of checklist as an aid to this determination.’

While it is appreciated that such a checklist is for the local authority’s use, for the purposes of this screening request, we offer a partially-completed Scottish Government Environmental Impact Assessment: screening checklist, which addresses the assessment criteria set out by Schedule 3 of the regulations, for the Council’s consideration.

As part of early discussions with Council officers, it has been largely agreed that any future planning application will be accompanied by appropriate technical assessments and surveys sufficient to identify any environmental impacts arising from the proposed development and any mitigation necessary. In addition to the statutory including the following:

- Design and Access Statement;
- Transport Assessment;
- Active Travel Plan;
- Planning Statement;
- Heritage Statement;
- Ecology and Protected Species Surveys;
- Tree Survey;
- Marine noise modelling;
- Noise Impact Assessment;
- Air Quality Assessment;
- Site Investigation/Geo-Environmental;
- Flood Risk Assessment (inc Coastal Flooding);
- Drainage Impact Assessment;
- Landscape/Seascape (Visual) Impact Assessment;
- Lighting Strategy.

Additional information in relation to the operation and construction of the proposals can be provided as part of the application package or under conditions attached to any consents that may be granted, however it is not considered that such items merit an EIA Report. In summary, it is considered that the proposals are not likely to have any significant adverse effects on the environment and will be accompanied by appropriate assessments to establish and/or mitigate any impact. As such, it is respectfully submitted Aberdeen City Council that the proposed development does not constitute EIA development, and therefore an EIA Report is not required to accompany any planning application.

I trust the above is sufficient to progress our request, however, should you require further detail, please do not hesitate to get I touch. I would also be grateful for your acknowledgment of this letter and look forward to your response.

Yours sincerely



Chris Mitchell

Associate Director

cmitchell@keppiedesign.co.uk

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EIA Screening Checklist

Location Plan

Beachfront Projects Feasibility Report (25th August CGR Committee) - Appendices B, C and D