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To: Councillor Cooney, Convener; Councillor Jean Morrison MBE and Graham, Vice Convener; and Councillors Allan, Corall, Cormie, Crockett, Delaney, Dickson, Jackie Dunbar, Finlayson, Flynn, Grant, Laing, Milne, Noble, Samarai, Thomson and Yuill.

Town House,
ABERDEEN 19 October 2015

COMMUNITIES, HOUSING AND INFRASTRUCTURE COMMITTEE

The undernoted items are circulated in connection with the meeting of the **COMMUNITIES, HOUSING AND INFRASTRUCTURE COMMITTEE** to be held here in the Town House on **TUESDAY, 27 OCTOBER 2015 at 2.00 pm**.

FRASER BELL
HEAD OF LEGAL AND DEMOCRATIC SERVICES

B U S I N E S S

10.1 Aberdeen Local Development Plan - Proposed Plan, Summary of Representations and Responses (Pages 3 - 450)

Appendixes for Local Development Plan

Should you require any further information about this agenda, please contact Emma Parr, tel 01224 522607 or email emparr@aberdeencity.gov.uk

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Appendix 1 - List of Issues

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Issue (ref and heading):	VISION AND GENERAL SPATIAL STRATEGY	1
Development plan reference:	Pages 3-7	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Ken Hutcheson (9)
Mr George Wood of Old Aberdeen Community Council (100)
Mr Peter Roberts of Cults, Bieldside & Milltimber Community Council (102)
Mr Alan Strachan of Nigg Community Council (111)
Mr Mike Williams of c/o Scott Hobbs Planning on behalf of Scottish Enterprise (120)
Mr Anthony Aiken of Colliers International on behalf of MacTaggart and Mickel Homes (123)
Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148)
Mr Oliver Munden of Persimmon Homes (157)

Provision of the Development Plan to which the issue relates:	The first two chapters of the Proposed Plan set out the Vision and Spatial Strategy for development over the lifetime of the Plan.

Summary of the representation(s):

Phasing and Infrastructure

9: Detailed phasing of developments is required to ensure the infrastructure is developed to match the development of housing

111: Whilst accepting in principle, and supporting the objectives of the Proposed Plan, respondent is of the opinion that many of the suggested proposals intimated as being required to encourage the economic and financial growth of Aberdeen City and North East should be suspended until existing infrastructure problems are resolved.

148: Generally supportive of the Spatial Strategy but want to emphasise the importance that adequate provision is made for healthcare facilities to serve new development. Existing facilities are already pressurised and incapable of catering for new development.

New Employment Land

120: In order to achieve the full potential of the area around the new harbour expansion, new employment land allocations require consideration.

General Comments

100: The aims of the Plan are ideal however the means of delivery are not clear and succinct. We would wish to see all of the Aims in Section 1 delivered within the

timescale of the Plan.

Define what is meant by "Housing allowances" in Section 1.9. Are these houses, flats, beds etc?

Section 2.1 promotes the city centre as the commercial, economic, social, civic and cultural heart of Aberdeen but all of the major commercial and economic developments are peripheral to the city centre and essentials such as transport transfer hubs and traffic circulation are not being fully addressed.

Section 2.5 states that "New developments will have to be of the best standard". This is highly desirable and it has sadly been neglected in current developments. All public developments should be subject to a design competition to ensure that they are of a high standard and show leadership which will encourage the commercial market to follow suit.

Section 2.9 People will not choose residential location simply on it's proximity to their place of work. Effective alternatives to car travel must therefore be delivered in the form of public road transport, rail links and dedicated cycle routes.

102: Agree with the position of no further large scale development along Deeside.

Table 8 is missing OP41 Friarsfield which is still under development.

A local landowner has submitted a proposal to include land at Brookfield/Murtle Den. As long as the approval was conditional for the land to be only used for housing for over 50's we would have no objections.

120: The Proposed Plan reflects well the current NPF3 and SPP status and requirements particularly with regard to the ambition of the plan in relation to place.

There is no Spatial Strategy Plan. A clear visual representation of the overall intentions would be welcomed.

The Plan could also show areas which have a regional significance for development, and an overlap between the City and Shire boundaries - for example Energetica and other growth areas and settlements which are bisected by the Council's boundary lines.

157: Introduction does not fully take account of the national planning policies and guidance. Specifically there are no comments made in relation to Scottish Planning Policy, which should be considered as one of the key documents to Scottish Planning. The key point from SPP is to "introduce a presumption in favour of development that contributes to sustainable development".

123: Noted from the Action Programme that there remains significant work to be carried out in order to deliver some of the masterplan zones. The Council are urged to realistically consider how achievable these aspirations may be and what procedures and sites are in place should a shortfall in housing numbers occur.

Modifications sought by those submitting representations:

Phasing and Infrastructure

148: Healthcare sites should be identified and set aside for healthcare facilities and should be capable of accommodating 50% expansion in the future. This should include the new sites allocated at Peterculter.

Employment Land

120: Devise the Action Programme to give priority to the development of associated employment land. Expand paragraphs 3.71 and 3.72 to make cross reference to other appropriate policies within the plan.

General Comments

102: Inclusion of OP41 Friarsfield in Table 8.

129: Include a Spatial Strategy Plan within the Introductory or Spatial Strategy sections of the Plan.

123: Requested that the council review the ability of the masterplan zones to create strong landscapes within which smaller developments in local communities can take place. The Proposed Plan does not provide a level of information to set out how these zones are to integrate with adjacent existing settlements and what their development mean for the context and setting of smaller sites.

Have a review of the green belt and green space network to assist in linking these zones without detrimentally affecting the small area of Bucksburn which has been omitted from either zone.

Include reference to how shortfalls from the masterplan zone developments are to be dealt with as the plan progresses.

157: Question the need for every major site to require a Masterplan created with community involvement, and would request a definition for major development to be included within the plan. Respondent believes this should only apply for sites of a certain size and would suggest 200 units or larger, rather than small sites. This is necessary to ensure the required 5 year land supply is met - small sites can assist where larger sites have not started or are not being developed as expected.

157: In order to assist the readability of the plan, respondent requests a table is included around page 8 which includes a breakdown of the locations, number of units and anticipated delivery timescales for all those identified brownfield sites, as per Table 2: Greenfield Development Allowances and Allocations. Respondent believes this will assist with the usability and understanding of the Plan, and provides a single location to determine the locations of development within Aberdeen.

Summary of response (including reasons) by planning authority:

Phasing and Infrastructure

9: We agree that it is important to assess infrastructure requirements associated with new development and publish these in a Local Development Plan (LDP). Such good practice aims to provide clarity to the development industry and other stakeholders. The broad infrastructure requirements are set out in Appendix 3 of the Proposed Plan. Masterplan Zones are identified to distribute infrastructure requirements and to assist the coordination of planning and delivering such infrastructure. Further detail on the phasing and timing of development and associated infrastructure is set out in the Proposed Action Programme (CD47).

111: Planning obligations can only relate to the development that is being proposed - developers cannot be obliged to 'make up' for pre-existing infrastructure deficiencies. From the outset of the Local Development Plan preparation, the Council has taken a proactive approach by identifying infrastructure required to support new development. This process has involved working with a range of organisations through the Future Infrastructure Requirements and Services (FIRS) Group to assess the capacity of existing infrastructure and its ability to cope with new development in each area of the City, and to then assess additional infrastructure required. Where it is considered necessary, conditions have been placed upon planning consents which limits the amount of development that can take place until a specified project is complete. An example is where the Council have restricted the number of houses that can be built in some developments prior to the completion of the Aberdeen Western Peripheral Route (AWPR).

148: The healthcare requirements arising from new developments were provided by NHS Grampian (who are part of FIRS) and are identified in Appendix 3 of the Proposed Plan and in the Proposed Action Programme. The Proposed Plan therefore sets out what is needed in each development but does not identify sites. The detailed siting of healthcare facilities within a new development is an issue that should be addressed in individual masterplans for sites. Setting aside further land for future expansion is considered unnecessary given that the Proposed Plan has a 20 year time horizon to 2035.

The Council considers that this approach represents a positive step forward for the planning and delivery of infrastructure by providing details of infrastructure requirements clearly and early in the Development Plan preparation process, based on the latest information available. Infrastructure provision and planning obligations will continue to be negotiated at the planning application stage. However, the approach provides clarity to all parties on what is generally expected to be provided as part of new development.

New Employment Land

120: The employment land allocations required by the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) are set out in Figure 6 of the SDP.

This requires the Aberdeen City Local Development Plan to allocate 105 hectares of employment land to 2026 and a further 70 hectares of Strategic Reserve Land for the period 2027-35. Table 2 of the Proposed Plan (on page 9) shows that we have allocated 143 hectares to 2026 (it reads 130 hectares which is an error addressed by the Council as a Non-Notifiable Modification (CD26)) and a further 66 hectares to 2035. The SDP also requires a minimum of 60 hectares of marketable employment land to be available at all times in Aberdeen City (Figure 6). The latest Employment Land Audit 2014 (CD35) shows that Aberdeen has 140 hectares available as of 2014 (Figure 4). We therefore consider that the employment land requirements of the SDP have been fully met.

Whilst it is reasonable to assume that the development of a new harbour at Nigg Bay will stimulate demand for employment land and sites in the vicinity, this is an issue which will be addressed in the next iteration of the Local Development Plan, and from the time the new harbour becomes operational. This has been recognised by the Harbour Board itself in the Draft Nigg Bay Development Framework which is currently under preparation. In the programme for delivery highlighted in the Development Framework (pages 36 and 41), consideration of additional land through a subsequent Local Development Plan review is scheduled for development in 2019 and in year 8 – i.e. the Main Issues Reports for the Local Development Plan 2021 and the Local Development Plan 2026 respectively.

General Comments

100: Whilst we would also like to see the aims of the Proposed Plan fully delivered, it needs to be borne in mind that the Vision (which is based on the vision of the SDP) is a longer term one that goes beyond the lifetime of the LDP to 2035. There will therefore be a number of reviews of the LDP before this time and, even assuming that the Vision remains consistent over this period, LDP's are likely to change in order to address changing circumstances and requirements. It should be noted however, that progress will be monitored through the Action Programme and reported in more detail in the next version of the Monitoring Statement.

The housing allowance is the number of dwellings that the SDP requires the Proposed Plan to allocate. This could be houses or flats.

In line with paragraph 60 of Scottish Planning Policy (SPP) (CD5), the Proposed Plan supports a Town Centre First approach to retail, commercial and leisure development. Office developments are encouraged into or close to the city centre and a specific West End Office Area has been identified (via Proposed Plan Policy B3) along with an area of proposed Specialist Employment Land to the south of Union Square around Poynernook. However, demand for city centre locations is high and space is limited and in order to accommodate anticipated business growth, the SDP requires significant employment land allocations to be identified as mentioned above. These are mainly concentrated in Bridge of Don, Dyce and the Airport, Kingswells and Altens. Although these are peripheral to the urban area of Aberdeen, they serve a much wider catchment that extends well into Aberdeenshire.

Considerable public investment into the transport system is currently underway with the construction of the AWPR, Third Don Crossing, Balmedie to Tipperty duelling,

A96 Park and Choose and the Dyce Drive link road. Other schemes are planned and land reserved in Proposed Plan Policy T1 - Land for Transport. In addition, the adoption in June 2015 of the Strategic Transport Fund as Supplementary Guidance to the SDP (CD19) will secure funding to deliver transport infrastructure required as a result of new developments in and around Aberdeen. Projects arising from this are listed in paragraph 3.44 of the Proposed Plan. Taken together with policies encouraging sustainable and active travel (Proposed Plan Policy T3), the means and investment is taking place to ensure that the city region's growth can be served by a fit for purpose transport system and supported by a robust policy framework.

102: Friarsfield is not included in Table 8 of the Proposed Plan because it was a site first identified in the Aberdeen Local Plan 2008 (CD43). It therefore pre-dates the allocations that have arisen out of the SDP and the Aberdeen City and Shire Structure Plan 2009 (CD20), and so does not count towards them. It is still identified as an Opportunity (OP) Site because parts of it are undeveloped and still have to obtain planning consent. The site at Brookfield/Murtle Den is considered in Issue 12 Alternative Sites in Deeside.

120: It is considered that the Proposals Map which accompanies the Proposed Plan provides an adequate representation of the Spatial Strategy in that it shows the allocations, Opportunity Sites and zonings for the whole city area. There are no settlements bisected by the city boundary, although two Opportunity Sites within the Proposed Plan, at OP53 Aberdeen Gateway and OP34 East Arnhall, comprise developments that extend into Aberdeenshire. The boundary and extent of the Energetica Corridor is shown in the Proposed Supplementary Guidance on Energetica (CD25).

157: Scottish Planning Policy contains advice which is applicable to all Planning Authorities in Scotland and seeks to ensure a broadly consistent approach amongst them. Appropriate referencing is made to it throughout the Proposed Plan and it is cited in paragraph 1.11 as one of the key documents that has informed the Plan preparation. The SDP and National Planning Framework 3 (NPF3) (CD04) contain parts which relate directly to Aberdeen. For instance the Proposed Plan and the SDP share the same Vision and NPF3 contains National Developments in Aberdeen. This is why both these documents have greater prominence in the Proposed Plan Introduction.

There is no evidence that increasing the size threshold of sites requiring a Masterplan will have an effect on the 5 year housing land supply. Issue 2 shows that the supply is in a very healthy position under current arrangements.

The table of brownfield sites appears in Appendix 1 of the Proposed Plan rather than the Introduction for two reasons. Firstly, it’s size means that it is more appropriately placed in the Appendices. More importantly, the tables are a snapshot of potential sites and consents at the time (in this instance taken from Brownfield Potential Study of 2014 (CD36). This changes over time as existing sites are developed and new sites emerge. This is a more fluid situation than that applied to the greenfield allocations which are identified in the Proposed Plan and which are effectively 'fixed' over the Plan period.

123: Paragraph 3.36 of the Proposed Plan explains that Masterplan Zones are identified within which developers will be expected to work together to prepare Masterplans for each zone, and coordinate the planning and delivery of associated infrastructure requirements. The Aberdeen Masterplanning Process - A Guide for Developers (CD46) explains what is expected from Masterplans and Development Frameworks including, in Section 3, their content. This should include a site description, including the surrounding area on issues such as open spaces, the landscape, Green Space Network and so on, and the context, identity and connections between them. We consider that it is for the Masterplans and Development Frameworks to consider the detail of integration with existing communities and smaller sites, rather than the Local Development Plan. Further, because of the very limited scope of additional greenfield land release (over and above that already identified in the extant Aberdeen Local Development Plan 2012 (CD42)), we do not consider that a review of the Green Belt and Green Space Network is necessary at this time. The potential for shortfalls in the housing land supply are discussed under Issue 2 - Housing and Employment Land Supply.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	HOUSING LAND SUPPLY AND POLICY LR1 & LR2	2
Development plan reference:	Pages 7-10	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Gary Purves of Knight Frank LLP on behalf of Avant Homes (31)
Mrs Eve Glegg (50)
Mr Gary Purves of Knight Frank LLP on behalf of Mr McDonald (56)
Mr Ian Livingstone of Ryden LLP on behalf of Stewart Milne Homes and John Lawrie (Aberdeen) Ltd (64)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr Sandy Hutchison (113)
Mr Ian Livingstone of Ryden LLP on behalf of Stewart Milne Homes (117)
Mr Anthony Aiken of Colliers International on behalf of MacTaggart and Mickel Homes (123)
Mr Christopher Ross of Barratt North Scotland (125)
Ewan Maclean of Emac Planning LLP on behalf of Stewart Milne Homes (128)
Gladman Developments (129)
Ms Christine Dalziel of Halliday Fraser Munro on behalf of CALA Homes (North) Ltd (131)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Mr Tim Reid of Urban Wilderness Ltd on behalf of The Reid Family (138)
Mrs Theresa Hunt of Burness Paull LLP on behalf of Cults Property Development Limited (142)
Mr Blair Melville of Homes for Scotland (149)
Mr Steve Crawford of Halliday Fraser Munro on behalf of Drum Property Group (150)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Miss Jennifer Woods of NLP Planning on behalf of British Airways (153)
Mr Gary Purves of Knight Frank on behalf of Rubislaw Estates (154)
Mr Bob Reid of Halliday Fraser Munro on behalf of Mr John McIntosh (156)
Mr Oliver Munden of Persimmon Homes (157)
Ms Meabhann Crowe of Colliers on behalf of AA Webster and Sons (162)
Ms Meabhann Crowe of Colliers on behalf of MacTaggart and Mickel Homes and Mr Fabrizio Necchi (163)
Mr Ben Freeman of Bancon Developments(183)

Provision of the Development Plan to which the issue relates:	Policies LR1 and LR2 (on page 10 of the Proposed Plan) make provision for phased housing and employment land release, and for the provision of mixed use communities where they have been identified.

Summary of the representation(s):

Additional Housing Land Required

31, 56, 128, 129, 131, 150: Additional housing land should be identified to meet local need and comply with the requirements of the Strategic Development Plan. The policy does not meet with SPP's intentions of providing an effective 5 year land supply at all times

64, 117: The city's population, from the census figures is greater than the forecast figures, this discrepancy along with the low rate of housebuilding will likely result in housing shortages in the long term due to insufficient housing land allocations.

85, 138, 150, 152, 154: There has been a failure on the part of the LDP to deliver housing requirements, and this shortfall has been compounded by sites not being built out in the timescales expected (for example at OP38 Countesswells). There is a shortfall of 578 homes in the period 2016-2035.

150, 156: Carrying forward allocations as they are does not deal with historical housing need shortfalls, reduces supply relative to demand and increases the difficulty in those needing to access housing being able to do so. Liverpool and Sedgefield carry forward some or the entire historical shortfall into future housing land allocations over and above the need projected for that period. These allow housing delivery to catch up with housing need. Aberdeen's LDP ignores the historic shortfall.

152: The LDP should clearly set out the housing land requirement and housing land supply for the 5 year and 10 year period of the LDP, not just the SDP allowances. A Table that clearly sets out the 5 and 10 year housing land requirement would provide clarity and assist in the monitoring of the delivery of housing land. The Table should also illustrate an increase in the housing land requirement by 10-20%

142, 162, 163: The review of the LDP requires to critically assess the greenbelt boundaries currently identified in in the adopted Plan in order to find suitable land for development to meet SDP requirements for growth.

Large and Small Housing Sites

31, 56, 117, 123, 125, 128, 129, 131, 149, 152, 154, 156, 157, 162, 163: The allocations in the Proposed Plan are for large scale allocation; as evidenced in the Housing Land Audit no homes have been completed on these sites. Several of these sites are delayed due to various constraints. The reliance of existing allocated sites being carried out from the 2012 adopted LDP is flawed because there are situations where some/part of these historic allocations are large-scale and there remains a significant level of detailed work and consents to be put in place before deliverability on the ground will occur. There has been no test of their effectiveness as required by the SPP.

Small scale and readily deliverable sites are required to make up the shortfall of effective land supply. The ability of small-scale greenfield sites to be released and built-out in a timeous manner should be acknowledged in the emerging Plan. The Plan does not currently support small-scale residential land releases which are

responding to local needs

The Council have not suggested to include a draw-down mechanism to meet any shortfall which may occur in Phase 1 or 2 of the land release schedule. Provisions should be made within Policy LR1 regarding the role smaller-scale sites have to play in meeting overall housing targets. There should be an allocation of a wider range of sites in terms of scale and location to ensure greater flexibility. Policy LR1 would therefore benefit from an additional Part C setting out the Council's response in the event that a 5-year effective land supply is not maintained.

Policy LR1 and LR2

183: Part B is redundant as Phase 2 sites are reliant on Phase 1 sites being built out. Two of the sites identified on the Proposed LDP to delivering houses beyond 2026 are constrained in the HLA 2015, and could not be drawn down early.

183: LR2: Delivery of Mixed Use Communities - It is not clear to which site this policy applies.

136: Whilst paragraph 2.18 refers to encouraging mixed use, this is not reinforced by Policy LR1, which should contain wording which reinforces the desire for all large-scale developments to be mixed use.

153: NPF3 identifies improvements to Aberdeen Airport as one of the developments considered essential to the delivery of the Aberdeen Spatial Strategy. In order to safeguard and build upon the future role of the Airport, consistent with this NPF3 objective, it is important that any land use allocations and any proposed development that comes forward within these allocations should have appropriate and proper regard to airport operations.

Less Housing Land Required

50, 113: Questions whether additional houses are needed due to the downturn in oil. The reality is that most housing developments cannot be completed in Aberdeen.

Brownfield Housing

64: SPP encourages the prioritisation of brownfield land. The SDPA aims to provide 40% of all new residential development on brownfield land. This is not reflected in the current housing allocations.

152: Whilst the LDP (para 2.13) states that future Local Plans will continue to identify brownfield sites to meet housing allowances beyond the next 7-10 years, this LDP does not provide certainty that the brownfield housing land supply will be achieved through allocations in this LDP in the period up to 2026, as required by Figure 1 of the SDP. A shortfall in the supply of deliverable brownfield sites provides justification for releasing additional greenfield land to accommodate the shortfall.

Modifications sought by those submitting representations:

Additional Housing Land Required

31: Remove land adjacent to the Mill of Mundurno from the Green Belt and Green Space Network and identify it as greenfield housing allocation post 2017.

117: Allocate effective sites such as Derbeth, Gillahill and Huxterstone.

152: Introduce additional sites to augment the supply. These include land at Foggieton, Countesswells, land at Kingswells East and land at Shielhill Farm.

162: Allocate land at Derbeth Farm

56, 85, 128, 142, 150, 183: In order to comply with the SDP targets there must be additional greenfield housing land allocations made in the forthcoming LDP which are immediately available and are without any constraints to their delivery. Change Section 2 and the Proposals Map as appropriate.

123, 163, 183: Allocate additional small sites.

152: Introduce a new table clearly identifying the housing land requirement and housing land supply over the 5 and 10 year period of the LDP, together with a 10-20% increase on the housing land requirement.

Policy LR1 and drawing down additional sites to augment supply

128, 149, 152: The wording of LR1 should be changed to ensure that a minimum five year supply is maintained at all times. If there is a shortfall in the effective land supply, the Council should consider further proposals that are effective.

129: Include a policy for assessing housing proposals on unallocated land when faced with a shortfall in the housing land supply.

153: The preamble text to Policy LR1 should provide explicit guidance to developers at the outset in relation the constraints that airport operations impose upon development.

Policy LR2

183: Define a large site, therefore where this policy should be applied.

Summary of response (including reasons) by planning authority:

General Overview

Aberdeen City sits within the Aberdeen Housing Market Area, along with those parts of Aberdeenshire closest to the city. As a consequence, there is a shared responsibility for meeting the housing requirement in this area. This is facilitated by the Aberdeen City and Shire Strategic Development Plan 2014 (SDP) (CD12) which clearly sets out the responsibilities of each council in terms of the provision of housing land.

The Aberdeen City and Shire Strategic Development Plan was approved by Scottish Ministers in March 2014, before Scottish Planning Policy (SPP) (CD5) was published in June 2014. Some of the terminology in the SDP differs slightly from SPP, although they are broadly consistent.

The Housing Requirement (set out in SDP Figure 10) equates to the Housing Supply Target under SPP – setting out a target for new homes over the period to 2035. In order to facilitate this, Housing Allocations (in SDP Schedule 1) are set out which need to be allocated in the respective local development plans, equating to the housing land requirement. As demonstrated in the Housing Land Audit (CD17), the adequacy of the supply of housing land is measured with reference to the Housing Requirement.

New information in the form of the census or new population or household projections are an issue for the next Housing Need and Demand Assessment (HNDA) to inform the next Strategic Development Plan, as confirmed by the SDP Examination. The task of the Local Development Plan is to implement the SDP.

The Aberdeen Housing Market Area has a very generous supply of effective housing land – both at the current time but also well into the future.

Additional Housing Land Required

31, 56, 64, 85, 117, 128, 129, 131, 138, 142, 150, 152, 154, 156, 162, 163: The Aberdeen City and Shire Strategic Development Plan 2014 sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans. Paragraph 4.18 of the SDP explains that expectations of housing need and demand over the period to 2035 have been assessed in a Housing Need and Demand Assessment 2011 (CD14). The housing requirement is set out in Figure 10 of the SDP and shows a total requirement of 53,972 homes over the Strategic Development Plan area to 2035 – 38,488 of which is in the Aberdeen Housing Market Area. Schedule 1 of the SDP (on page 42) shows the housing allowances required to be identified in the Local Development Plan. The SDP explains in paragraph 4.24 that these allowances provide a generous supply of land for new housing on top of the housing requirement in line with Scottish Planning Policy. For the SDP area the allowance is for 67,500 homes (plus an effective supply in 2011 of 9,815) compared to the requirement of 53,972 homes (representing 43%

generosity). In the Aberdeen Housing Market Area, the generosity level is 49% (land for 57,418 homes against a requirement of 38,488).

As a consequence, a very generous SDP allowance has already been provided by the Proposed Plan over and above the actual requirements, exceeding the levels required by the new SPP. There is therefore no need to add to this as has been requested. In addition there is no remit for the Proposed Plan to allocate significant amounts of additional land which would cause it to be inconsistent with the SDP. Circular 06/2013 Development Planning (CD10) states in paragraph 56 that LDP's need to be consistent with the SDP. Paragraph 4.25 of the SDP clearly states that LDP's have to make land available for homes in line with the Spatial Strategy and Schedule 1 of the Plan. Table 2 of the Proposed Plan (page 9) shows how these allowances have been met. This Table shows that, for the periods up to 2026, the Proposed Plan allocates 16,982 greenfield homes which is just 18 homes short of the 17,000 SDP allowance over the same period. This 0.1% 'shortfall' is not considered to be of any material significance in the context of a very generous allowance.

The Housing Land Audit indicates that the area is on-track to deliver housing completions in line with the housing requirement over the period 2011-2016. In any event, because of the SDP compliance issue, it is not possible to carry forward historical shortfalls, even if they do exist. Nevertheless, sites which have been allocated in previous Local Plans and the extant Local Development Plan 2012 continue to be identified where appropriate. For instance, proposed sites OP41 Friarsfield and OP58 Stationfields in the Proposed Plan continue to be identified from the Aberdeen Local Plan 2008 (CD43). These do not count towards the SDP allowances.

It is not appropriate to rely on recent census or population / household forecast figures to argue for a higher requirement and allocations from those contained in the SDP for the same reason. In any event, the generosity of the SDP allowances is such that it should be possible to accommodate any potential demands arising from fluctuations in forecasts. This was confirmed at the SDP Examination (Issue 5), while the most recent 2012-based projections are lower than those put forward to justify an increase at that time. The Housing Need and Demand Assessment is the vehicle for addressing these issues, not the local development plan. Development Plans need to provide certainty for developers, agencies, infrastructure providers and the public. Constantly reacting to variations in census data (either up or down) would not achieve this.

Monitoring the delivery of housing land is carried out in the annual Housing Land Audits that are prepared jointly between Aberdeen City and Aberdeenshire Councils. There is no need to repeat this in the Local Development Plan. As mentioned under Issue 1, because of the very limited scope of additional greenfield land release (over and above that already identified in the extant Aberdeen Local Development Plan 2012 (CD42)), we do not consider that a review of the Green Belt is necessary at this time.

Specific Sites

31, 152: The sites at Mundurno and Shielhill are dealt with under Issue 4 Alternative Sites in Bridge of Don.

117, 162: The sites at Derbeth, Gillahill and Huxterstone are dealt with under Issue 8 Alternative Sites in Kingswells and Greenferns.

152: The sites at Foggieton and Countesswells are dealt with under Issue 10 Alternative Sites in Countesswells.

Large and Small Housing Sites

31, 56, 117, 123, 125, 128, 129, 131, 149, 152, 154, 156, 157, 162, 163: There is no shortfall in the 5 year effective land supply. The 2015 Housing Land Audit (HLA) shows the latest position in its Section 5. Section 5.4 shows a continuing upward trend of supply in the Aberdeen Housing Market Area. Paragraph 5.4.2 states that, for the fourth year in a row, the 5-year effective supply in the Aberdeen Housing Market Area has increased and it now stands at 12,091 homes - its highest level since Local Government reorganisation in 1996.

Figure 13 of the Housing Land Audit 2015 shows an effective supply in the Aberdeen Housing Market Area of 12,091 homes compared to an SDP requirement of 7,827 homes, which amounts to 7.7 years supply – well in excess of the 5-year requirement set out in SPP. Appendix 3 of the HLA shows the actual and anticipated housing completions over the SDP area. The anticipated completion rate in 2016 is 2875 homes which compared favourably with the SDP target of building at least 2500 homes a year by 2016 (on page 32 of the SDP). Figures then rise to over 3000 homes per year for 2017-19 which is ahead of the SDP target of moving towards building 3000 homes a year by 2020. Anticipated figures then begin to drop again beyond year 5, but this is to be expected in any such Audit. However, the effective supply beyond 2019 is higher than it is within the period 2015-2019. It would be reasonable to expect further windfall, brownfield and currently constrained sites to be added to the supply to boost these figures over that period.

Of the 25 greenfield housing sites identified in Tables 3 to 8 of the Proposed Plan, 16 sites are of 500 homes or less, with 11 being less than 100 homes. In addition there are 43 brownfield sites identified in Proposed Plan Appendix 2 - Opportunity Sites which are suitable for residential uses or a mixture of uses, including residential. Brownfield sites with the potential for residential use are identified in the two tables at the end of the Brownfield Potential Study 2014 (CD36). There is therefore a very wide range of sites both large and small, brownfield and greenfield which are collectively contributing to a very positive picture for future house completions.

The identification of a number of large sites is necessary in the context of the generous SDP housing allowances that are required. Large sites support a range of facilities and services within the new development, enable the delivery of significant infrastructure improvements, and avoid the problems that disjointed incremental growth has. Through the Site Assessment process (CD28 to CD31) we have sought to identify sites which can make the most efficient use of existing infrastructure. It is

acknowledged that large sites take longer to come to fruition. The Housing Land Audit 2015 shows a snapshot position as of 1 January 2015. Although some of the allocated sites are regarded as constrained at that point, Scottish Planning Policy (paragraph 19) requires city regions to allocate "a range of sites which are effective or *expected to become effective in the plan period* to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption." All of the large sites identified in the Proposed Plan have either a Masterplan or Development Framework in place which has been adopted as Supplementary Guidance to the extant Local Development Plan 2012. The 2015 Housing Land Audit shows that several of these will start delivering completions within the next 5 years. These will help to ensure the maintenance of a continuing 5 year supply housing supply over the lifetime of the Proposed Plan, and beyond.

In summary, we have a generous housing allowance resulting in a wide range of greenfield and brownfield sites being identified in the Proposed Plan. These are likely to be augmented by further windfall and brownfield sites and sites identified through future Brownfield Potential Studies. There is a very healthy land supply and this is likely to be maintained as the larger sites progress. In this context there is no need for a draw down mechanism to augment the supply. In any case, such a mechanism is not identified in SPP.

The suggestion that larger sites which will not deliver their full Phase 1 allowance in the current Phase should have this short fall re-allocated to new sites is noted. It is recognised that this suggestion is not that this shortfall should be removed from these sites, but rather re-scheduled to a later Phase. In effect the shortfall would then become an additional allocation to make up for the initial delay. However, to redistribute allowances based on an initial 'delay' to the start of a site would remove the certainty which the Plan aims to provide and could impact on the deliverability of larger sites. It also represents a misunderstanding of the housing allowances, which were never designed to be built out within the period for which they were allocated (SDP para 4.24). If that had been the intention, completions would have had to exceed 6,000pa over the last few years (9815+27,300 built over 6 years) – more than double the highest individual year's completions over the last 35 years. This would be contrary to the SDP which is clear in its allocations for all Phases up to 2035.

The SDP recognises that front loading the allowances in the way it does means it is unlikely that all of them will be delivered in the timescales. Paragraph 4.24 of the SDP explains that, due to this generosity, "we cannot expect all the new homes to be built within the relevant plan period. This makes sure the plan can cope with higher levels of demand than we currently expect."

Policies LR1 and LR2

128, 129, 149, 152, 183: As detailed in the paragraphs above, it is not considered necessary to have a draw down mechanism to augment the land supply.

183: Proposed Plan Policy LR2 applies to those large sites which contain both a residential and employment allocation and these are identified in the Directions for Growth (Tables 3 to 8 in the Proposed Plan). It is accepted that this is not

immediately obvious. For the avoidance of doubt Proposed Plan Policy LR2 covers OP9 Grandhome, OP33 Greenferns, OP36 Countesswells, OP59 Loirston and OP48 Oldfold.

136: Proposed Plan Policy LR1 is about controlling the phased release of allocated greenfield housing and employment sites. We would agree that all large scale developments should be mixed use. This is embedded in much of the Proposed Plan but it particularly expressed in Proposed Policy D1 - Quality Placemaking and Design. Masterplans or Development Frameworks have been adopted as Supplementary Guidance to the extant Local Development Plan 2012 for all the large greenfield releases, and these studies set out in detail the mix of uses expected in each site. It would be our intention to readopt these Masterplans and Development Frameworks upon adoption of the Proposed Plan.

153: The operations of Aberdeen Airport are dealt with in Proposed Plan Policy B4 – Aberdeen Airport. This covers the Airport Safeguarding Area and highlights Circular 08/2002 – Control of Development in Airport Public Safety Zones. Noise issues are dealt with in Proposed Plan Policy T5 - Noise. Further detail on public safety zones, noise contours, safeguarding maps and operations area are covered in a Technical Advice Note on Land Use Planning and Aberdeen Airport 2015 (RD42). It is not considered necessary to repeat these issues in Proposed Plan Policy LR1.

Less Housing Land Required

50, 113: The above paragraphs explain why it is not possible to depart with any degree of significance from the requirements of the SDP. Paragraph 4.27 of the SDP recognises that meeting housing and population targets also depends on factors that are not related to the Development Plan, including the state of the economy and, particularly in Aberdeen, the price of oil. However, the SDP's Spatial Strategy has been agreed and the Proposed Plan identifies Aberdeen's contribution towards that. This ensures that the Proposed Plan can cope with higher levels of demand than we currently expect.

The SDP review process over the next few years will factor in emerging evidence of economic and housing market performance through a new Housing Need and Demand Assessment. This will subsequently feed into the next LDP.

Brownfield Housing

64, 152: Schedule 1 of the SDP sets out the brownfield housing allowances for Aberdeen City. For the two periods from 2011 to 2026, the allowance is for 7,500 homes, which equates to 500 homes per annum. Our approach to meeting this is set out from paragraph 2.8 of the Proposed Plan. This explains that we have identified sites with planning consents from 2011 (in Proposed Plan Appendix 1 Table 2) amounting to 2808 homes (up until 31 August 2014), and that these have not been double counted against those sites found in the effective land supply of 2011 which was used by the SDP. Added to this are the sites in Proposed Plan Appendix 1 Table 1 which were identified through the Brownfield Potential Study of 2014. This uses a number of different calculations to estimate the potential yield of identified sites – in this case between 2590 homes to 4479 homes. When added to the

consented sites, this amounts to between 5398 and 7287 homes (or between almost 11 years to 14.5 years when set against the SDP allowances of 500 homes per annum). Section 4.1 of the Brownfield Potential Study 2014 suggests that this is a conservative estimate.

It is not practical to identify brownfield sites too far into the future. It is also inevitable that more, as yet unidentified, brownfield sites will continue to emerge over the lifetime of the Proposed Plan. Much of this will be driven by the buoyant housing market here. Section 2.2 of the Brownfield Potential Study shows that brownfield housing completions have averaged 688 homes a year for the period 1993 to 2013. Only for the 3 years following the financial crash (2008-10) have there been fewer than 500 brownfield homes completed in each year (which is what the SDP requires).

In this context it is not considered appropriate to augment any potential shortfall of brownfield sites with further greenfield releases. This would be contrary to the SDP target for 40% of all new houses in Aberdeen City to be on brownfield sites (page 37 of the SDP). We will however, continue to monitor ongoing consents, completions and brownfield potential through regular updates of the Brownfield Potential Study.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	ALLOCATED SITES & GENERAL AREA STRATEGY : BRIDGE OF DON/GRANDHOME	3
Development plan reference:	Pages 11-12 and 79-80; Proposals Map: Map 1, Table 3, Appendix 2, Policy RT4	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Zara Lee (26)
Ms Lorraine Jones of sportscotland (41)
Mrs Pamela Shand (52)
Mr John Findlay of Ryden LLP on behalf of European Development Holdings Limited (58)
Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of Carlton Rock Limited (75)
Mr John McDonald (79)
Mr Malcolm Campbell of Knight Frank LLP on behalf of Moorfield Group Limited (94)
Mrs Shirley Copland (97)
Mr Chris Pattison of Turnberry Planning Ltd on behalf of The Grandhome Trust (101)
Mr Roger Laird of Archial Norr on behalf of Royal Aberdeen Golf Club (104)
Mr Roger Laird on behalf of Royal Aberdeen Golf Club (105)
Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of North East Scotland College (109)
Mr Mike Williams of c/o Scott Hobbs Planning on behalf of Scottish Enterprise (120)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Mr Fraser Littlejohn of Montagu Evans LLP on behalf of Buccmoor LP (160)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Overview of Direction for Growth in this area and specific Opportunity Sites

Summary of the representation(s):

Area Spatial Strategy General and Scope of Development

152: Respondent is concerned over the deliverability of large strategic housing sites and reliance on single sites to provide for the required housing land supply. In Bridge of Don and Grandhome area, the housing land supply is dominated by the allocation of Grandhome (OP9) for 4,400 houses. Two other sites are currently being

developed in the area and are both due for completion in 2017. After 2017 the housing supply is largely dependent on Grandhome coming forward and being developed at rate anticipated. An additional site is proposed to provide flexibility and choice in housing land supply - see Issue 4 Alternative Sites: Bridge of Don/Grandhome.

183: In the Bridge of Don/Grandhome area the allocations post 2017 are only to Grandhome. There is no choice available to developers. Failure to deliver the SDP requirement is most acute on the Grandhome site.

OP3 Findlay Farm

94, 120, 160: Policy zoning for OP3 and existing developed part of the Energy Park should be changed from Policy B2 Specialist Employment Areas to Policy B1 Business and Industrial Land.

94: Flexibility is required regarding types of permitted uses to allow the Energy Park to grow. Current zoning (under Policy B2) does not give flexibility and conflicts with recently granted consent for extension of the energy park which allows Class 4,5 and 6 with no restriction on Class 5. It would be more appropriate to change the zoning to Policy B1 - Business and Industrial Land. Respondent provides an example of an OP site at Dyce Drive which is proposed to be rezoned from Specialist Employment Areas (BI2) in the extant Aberdeen Local Development Plan 2012 (OP32) to Business and Industry (B1) in the Proposed Plan (OP23).

160: Existing allocation is outdated and there is significant market interest to occupy space at the Park. Allocation should reflect planning consent.

OP4 Dubford Community Facilities

26: Objects to development on the site. Concern raised about loss of green space for leisure/fauna, loss of views and safety. Local people strongly against.

OP6 Balgownie Primary School

79: Reference to condition 2 on decision notice for the development (dated 29 January 2015). Planning reference 131860. Condition states no development shall commence on site until a detailed landscaping scheme has been submitted and approved by the authority. Concerns that established trees should be retained wherever possible.

OP7 Aberdeen College Gordon Street

109: Support for continuing allocation of site. Request for additional land to be

zoned as part of OP7.

52: Request for retention of wood adjacent to the site, should it be developed, to protect the site from the sea winds. Concern raised over loss of trees in light of a shortage in Aberdeen and the Proposed Local Development Plan Policies and Supplementary Guidance which indicates a preference for retention.

105: Site lies adjacent to Royal Aberdeen Golf Club. As an important tourist destination and significant contributor to the local economy. The amenity and setting of the golf club should be protected if the site is to be developed. Support for Appendix 2 "Other Factors" statement to retain woodland on site along the sites boundaries.

OP9 Grandhome

101: Respondent welcomes approach to greenfield release for housing and employment allocations. In particular respondent supports the allocation of site OP9 for a mixed use development of 7000 homes and 5 hectares of employment land.

97: Transport - Respondent concerned about the extensive development and consequential impact on residential amenity and traffic congestion which is already a problem. Respondent not convinced that there is a sufficiently robust plan for dealing with the increase in vehicular road traffic that the development would bring. The Third Don Crossing may aid, but respondent doubts it can cope with rise in traffic as a result of the development. Serious consideration of alterations to transport network is required. Dualling of Parkway and Persley Bridge would be necessary in addition to Third Don Crossing. Developers would need to make large contribution to improve road network.

Pollution - Concerned about increase in noise and air pollution as a result of increased traffic and congestion. Concern regarding impact on residents and close proximity of the development site to schools and a health centre. Insufficient reassurance has been given that there has been sufficient consideration given to current residents.

Tree Band - Concern that the development would impact on and weaken the existing peripheral tree band if the development was built in too close proximity to it. Housing should only be allowed at a sensible distance from the established tree band for protection of the trees and rural amenity. Due consideration needs to be given to preserving the green space amenity of the area. The loss of farming land just for commercial gain will have a negative impact on the semi rural appeal of the Bridge of Don area.

OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don

94: Propose recycling facility should be located more centrally to serve the whole community and reduce the need to travel. Suggests Grandhome as a suitable location (close to eastern edge). If considered acceptable at OP13 then high standards of landscaping and amenity (which apply to the Energy Park) must be applied regardless of where it is located.

104: Does not support the formation of a recycling centre in this location. Concern raised regarding the proposed location of the recycling centre being adjacent to the 14th hole of Royal Aberdeen Golf Course. Setting and amenity of golf course should be protected. Support retention of existing woodland buffer along southern half of the eastern boundary - request more substantial strategic landscape belt. Concern regarding loss of public parking as a result of developing the site and the impact this may have on attracting high profile golf tournaments.

160: Strong reservations in respect of inclusion of a household waste recycling centre within the site. Limited reference to potential amenity impacts of the inclusion of the facility.

Proposed Plan does not qualify the nature of the waste recycling centre, its scale, or any environmental effect potentially prejudicing and undermining significant investment on nearby high amenity business and industrial development sites.

While statements will likely be made within any planning application submission regarding regulatory guidance and pollution control, it is not considered appropriate to allocate a site for this use if there has been no assessment.

OP75 Denmore Road

41: Policy NE3 should apply to the allocation as it currently contains two full size pitches and changing accommodation.

58: Support for allocation of the site and its identification as a Commercial Centre. Concern that the site can only be developed in the event that the North Demore Road site is developed - thus only maintaining not enhancing the retail offer in Bridge of Don and leaving a deficiency in retail provision in the area. The North Denmore Road site may not be developed. Given the size of the community and planned expansion to 2030 the Plan should be seeking to increase the retail offer in the area.

Expenditure leakage indicated in the retail capacity assessment for Bridge of Don area. Provision of additional food and non-food retail facilities would not have an adverse impact on existing facilities (Boulevard Retail Park, Kittybrewster or

Berryden) and could claw back some expenditure leakage.

Development would consolidate existing non-food retail provision, encourage relocation of units dispersed through Bridge of Don and encourage single trip shopping. No technical impediments - site can be accessed from A90 and is accessible to cyclist and pedestrians. Proposals are in place to relocate existing playing fields. Site would satisfy a local need and would not conflict with adjoining land uses. There would be no significant loss to landscape, character and amenity of site or adjoining areas. No signification wildlife value and remainder of site is bounded by business, industry and residential uses.

Land at Jesmond Drive

75: Respondent states the Proposed Plan incorrectly identifies land at Jesmond Drive as Urban Green Space rather than part of the existing built up area. Planning permission A4/0409 approved and consent implemented. Consent shows mixed use development on the site. The Council accepted the Reporter's findings to the Aberdeen Local Plan 2008 regarding removing the Urban Green Space designation from the site, but failed to carry out the amendments.

Respondent states that the error was repeated in the extant Aberdeen Local Development Plan 2012, with the boundary being further reduced. The Reporter did not consider the site boundaries in any detail as it was noted the planning permission had already been granted and development was underway. Current Local Development Plan 2012 zoning and Proposed Plan zoning contravenes the Council's and Scottish Government's finding on the site. Land is covered by an implemented planning permission and required to be included on the built up area. Current planning application pending for erection of 21 affordable homes on the land in question. Indicative layout attached to representation shows all open space will be actively maintained and existing footpaths preserved.

Modifications sought by those submitting representations:

Area Spatial Strategy General and Scope of Development

152: Allocate land at Shielhill Farm for a new mixed use neighbourhood.

183: Additional housing sites need to be allocated.

OP3 Findlay Farm

94, 120, 160: Policy zoning of existing Energy Park and proposed extension and

OP3 Findlay Farm be changed from Policy B2 (Specialist Employment) to Policy B1 (Business and Industrial Land). Consequential changes to Appendix 2.

OP4 Dubford Community Facilities

26: No development on site.

OP6 Balgownie Primary School

79: See and comment on submitted detailed plan of landscaping before any works start.

OP7 Aberdeen College Gordon Street

52: Retention of the wood should the site be developed.

105: Support for wording under Appendix 2 - OP7 - Other Factors. "The woodland on site, particularly along the site's boundaries, should be retained." Strongly supported to ensure amenity of the golf club is protected.

OP9 Grandhome

97: Reduce the extent of the development of OP9.

OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don

94: Consequential changes to Policy R4 and Appendix 2: Opportunity Sites due to requested removal of reference to a household recycling centre being located at OP13 (AECC site) and replace with OP9 Grandhome.

104: Deletion of household waste recycling centre from the allocation. If this is not favoured then under the "Other Factors" section in Appendix 2 include text: "The Household Waste Recycling Centre shall be sited to ensure that no adverse impact on the amenity of the neighbouring golf course arises" and "A strategic landscaping belt at least 20 metres in width shall be planted along the eastern boundary of the development."

160: Remove reference to OP13 being appropriate for waste recycling centre (to replace facility at Scotstown Road) and make more explicit reference to the nature and appropriateness of any such uses across the site being determined/guided by the Development Framework. This process may determine that other sites are more appropriate for such development.

OP75 Denmore Road

41: Previous Reporter's findings was that NE3 would apply to allocated development sites. If this remains the intention then policy protection in Scottish Planning Policy applies. If not, request reference made in the Plan to the need to compensate for the loss of facilities.

58: The Plan should accommodate both the consented convenience floor space at North Denmore Road and the existing bulky goods uses. It would be logical for both sites to be allocated through the Local Development Plan to accommodate a mix of convenience and bulky goods retailing. Descriptive text should be amended to allow the development of the site as an addition, and complementary to, the existing commercial centre at North Denmore Road.

Land at Jesmond Drive

75: Area outlined in plan attached to representation should be removed from Urban Green Space and included within the existing built up area.

Summary of response (including reasons) by planning authority:

Area Spatial Strategy General and Scope of Development

152, 183: The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination (Issue 5 pages 54 - 74) (CD13). The Reporter's conclusion stated "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agrees with these conclusions.

The Vision and Objectives for the Proposed Plan are the same as the Aberdeen City and Shire Strategic Development Plan 2014. The role of the Strategic Development Plan is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 06/2013 paragraph 41, CD10). The Strategic Development Plan sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans.

Large, strategic-scale housing sites form an important part of the Proposed Plan's ambition to create sustainable, mixed communities. The merits and current position

of Proposed Plan site OP9 Grandhome are discussed below.

Under Issue 2 we conclude that the Strategic Development Plan greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this Proposed Plan. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

The proposal for additional land is considered under Issue 4 - Alternative Sites: Bridge of Don/Grandhome.

OP3 Findlay Farm

94, 120: The existing Energy Park is a long established centre for research and product development for the oil, gas and renewable energy sectors with a history spanning nearly 30 years and with strong connections to research, design and development, knowledge driven industries and related education and training. Planning permissions granted to date have been restricted to the aforementioned uses. It is important to note that Proposed Plan site OP3 and the existing Energy Park are located at a key position in the Energetica Corridor. Planning Permission in Principle (P131483) was granted on 7 November 2014 for Classes 4 and 5, with Class 6 use restricted to being ancillary to the Class 4 and 5 uses and limited to 20%. The restriction reflects the extant Local Development Plan's (CD42) Specialist Employment Area designation.

The zoning in the Proposed Plan (unchanged from the extant Local Development Plan 2012) is considered relevant and appropriate. There is no need to rezone the existing Energy Park or OP3.

94: The respondent mentioned the proposal in the Proposed Plan to amend zoning at Proposed Plan site OP23 Dyce Drive. OP23 is proposed to be rezoned (from Specialist Employment Areas (BI2) in the extant Local Development Plan 2012 to Business and Industry (B1) in the Proposed Plan) to reflect an existing planning consent (P041165 (RD46)) which was granted (19 November 2012) Planning Permission in Principle for Class 4 use and ancillary Class 5 and 6 uses. The use granted and under construction at OP23 is akin to Business and Industry (B1) zoning. As discussed above the use granted at OP3 reflects the extant Specialist Employment Area designation. In this regard, the two sites are not comparable – OP3 is not under construction, the uses granted are different and there has been no submission of further applications for Matters Specified in Conditions at OP3.

OP4 Dubford Community Facilities

26: The site was allocated in the Aberdeen Local Plan 2008 (CD43) and is allocated

in the extant Local Development Plan 2012 as Opportunity Site OP6 reserved for community centre, primary school, local shops etc. The principle of this allocation was tested at the Examination into the Local Development Plan 2012 (CD44) under Issue 7. It remains appropriate to identify the site as a development opportunity for community facilities within the wider residential zoning as there has been no significant change in circumstances which would justify an amendment to this designation.

OP6 Balgownie Primary School

79: Detail of the site, including landscaping, design and amenity issues, is an issue for consideration at planning application stage and is not an issue for consideration at the Local Development Plan level. An application for Detailed Planning Permission (P131860) was given Conditional consent on 29 January 2015 in line with extant Local Development Plan policies on design, trees and woodland, landscape, open space and Urban Green Space. Appendix 2 – Opportunity Sites within both the extant Local Development Plan and the Proposed Plan specifically states "The amenity space to the west of the site should be retained." A landscape design scheme was submitted to the Council as per Condition 2 specified in the decision notice. The landscape design scheme is available to view online.

OP7 Aberdeen College Gordon Street

105: Support for Proposed Plan Appendix 2 - OP7- Other Factors text relating to retention of woodland, particularly along the site's boundaries, is noted.

109: Support for continued allocation is noted and welcomed. Request for additional land to be zoned as part of OP7 is considered under Issue 4 – Alternative Sites: Bridge of Don and Grandhome.

52: Concern over loss of trees is noted. We consider it appropriate to retain woodland within the site to ensure satisfactory residential amenity. The entry for Proposed Plan site OP7 in Proposed Plan Appendix 2: Opportunity Sites specifically states "The woodland on site, particularly along the site's boundaries, should be retained." The planning application process will consider the design and layout of the site including the presence of existing trees on site. It is not considered an issue which is insurmountable to the development of the site.

OP9 Grandhome

The Strategic Development Plan sets the requirements for greenfield housing/employment allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. The majority of greenfield sites identified in the Proposed Plan have been carried over from the extant Aberdeen Local

Development Plan 2012, and most are at an advanced stage in terms of planning consents and Masterplans as detailed in the Proposed Action Programme (CD21). This site is a desirable option because there are relatively few planning and topographical constraints within the site itself and its scale means that those that do exist (such as woodland and shelter belts and historic features) can be maintained and even enhanced. The scale of development would mean that it can support its own public transport infrastructure as well as services and facilities such as a new town centre, schools and employment land. Its single ownership will assist its deliverability. Large, strategic-scale housing sites form an important part of the Proposed Plan's ambition to create sustainable, mixed communities.

This site is subject to an approved Development Framework for the whole allocation (all phases of the LDP to 2035) which was adopted as Supplementary Guidance to the extant Local Development Plan 2012 in October 2013. The site is also subject to an approved Planning Permission in Principle (P131535) for a mixed-use development comprising: up to 4,700 homes, town and neighbourhood centres (including commercial, retail, leisure and hotel uses), employment land (circa. 5 hectares), community facilities, energy centre, open space/landscaping, and supporting infrastructure, including access in line with the first two Phases of the extant Local Development Plan 2012. This Planning Permission in Principle was granted in February 2015 with legal agreement to ensure the necessary developer obligations are secured.

101: Support for the allocation is noted. The allocation at Grandhome is a key part of the spatial strategy for the north of Aberdeen City.

97: In response to the respondents concerns, taking each in turn:

Transport - Traffic modelling has been undertaken and a range of works agreed to the local roads network as part of the assessment process of the aforementioned Planning Permission in Principle (P131535). This has taken into consideration the proposed phasing and occupation of homes. Contributions have been sought for both local and strategic road network improvements via a legal agreement. Strategic improvements to the road network will be provided by the Aberdeen Western Peripheral Route (AWPR), improvements to the Haudagain roundabout and Third Don Crossing. The Council and its partner the North East of Scotland Transport Partnership (Nestrans) are committed to these schemes, and the Third Don Crossing is due for completion early 2016. Other infrastructure improvements are listed in Appendix 3 of the Proposed Plan, the Proposed Action Programme and the 'Delivering Infrastructure, Transport and Accessibility' section of the Proposed Plan.

Pollution - The scale of development allocated will enable a range of facilities to be provided on-site, will reduce the need to travel, and will result in a more sustainable development. Sustainable and walkable neighbourhoods are one of six Core

Principles in the Grandhome Development Framework. A Noise Impact Assessment was undertaken as part of the aforementioned planning application process, and Conditions have been attached to the Planning Permission in Principle consent in the interests of mitigation and residential amenity.

Tree Band - As detailed in the Committee Report accompanying the Planning Permission in Principle and supporting documents (Planning and Design Statement, Landscape Statement and Development Framework) there are sections along the site boundary that are designated 'Ancient Woodland Inventory – Long Established Woodland (of plantation origin)' and areas of the site zoned under extant Policy NE1 (and this zoning continued via the Proposed Plan). As evidenced within the Development Framework, the areas of Green Space Network are being largely retained, and enhanced with additional green links across the site. The detailed layout of green spaces would be the subject of any subsequent Matters Specified in Conditions applications.

OP13 Aberdeen Exhibition and Conference Centre (AECC), Bridge of Don

94, 104, 160: A recycling facility is required within the Bridge of Don area to replace the current facility on Scotstown Road which is not considered fit for purpose. Its replacement is a key priority within the Aberdeen City Waste Strategy 2014 – 2025 (RD31 (pages 21 – 23)). Delivery of the facility at Proposed Plan site OP13 is within the control of the Council as landowner. The Council wish to ensure that these facilities are fit for purpose with an improved range of recyclables. The facility at Grove Nursery in Hazlehead Park is an example of a modern high quality facility which will be replicated at OP13. At the time of writing (August 2015), a public consultation process had recently been undertaken with regards to a draft Development Framework for OP13 and is due to go before the Planning Development Management Committee for approval on 29 October 2015. This masterplanning process provided a further opportunity for engagement with the community in relation to the detail of the site, which should address concerns in relation to the location, design, landscaping and mitigation of impact on the amenity of adjacent areas. The draft Development Framework provides two options for the location of the recycling facility within OP13. The final location for the recycling facility has not, therefore, been determined. Further surveys and tests will be required to determine the most appropriate location within the site as well as any necessary mitigation and licensing arrangements. The exact site and nature of the Household Waste Recycling Centre will be guided by the Council's Waste and Recycling Team. However, it is essential for the Development Framework to include options for it to ensure conformity with the Proposed Plan allocation as detailed in Proposed Plan Appendix 2: Opportunity Sites. Once the Development Framework has been approved it will be Interim Planning Advice. Once the Proposed Local Development Plan is adopted it will be put forward for adoption as statutory

Supplementary Guidance which will again allow for further consultation. Subsequent planning applications will enable further public consultation on the specific details on the site.

94: There is no requirement in the adopted Local Development Plan for a recycling facility within Grandhome which has had its Development Framework adopted as Supplementary Guidance and gained Planning Permission in Principle since the adoption of the extant Local Development Plan in 2012. It would not be appropriate to apply additional requirements to existing, 'rolled forward' development sites which already have consent.

104: As detailed above, the masterplanning process and any subsequent planning applications will consider detailed issues such as strategic landscaping and amenity of adjacent land uses. It is not considered appropriate to pre-empt the final decision regarding the location of the recycling centre by inclusion of text in the Proposed Plan relating to the golf course or proposed strategic landscaping.

160: It is not considered appropriate to pre-empt the final decision regarding the location of the recycling centre by inclusion of text in the Proposed Plan relating to the Development Framework guiding / determining the appropriateness of the use on the site. The Proposed Plan is the appropriate vehicle to determine the principle of land use – the Development Framework adheres to the requirements for the site as laid out in the Proposed Plan.

OP75 Denmore Road

41: Proposed Plan Policy NE3 would apply to the allocation. Paragraph 3.101 states "this policy applies to all areas of urban green space including those not zoned on the Proposals Map". Furthermore the entry for OP75 in Proposed Plan Appendix 2: Opportunity Sites specifically states, in the event of the site being developed for bulky goods, "Pitches lost should be replaced in Bridge of Don by new or upgraded pitches which are of comparable or greater benefit".

58: The Aberdeen City and Aberdeenshire Retail Study 2013 (CD16 (pages 14 and 57-59)) does not identify any quantitative deficiency of convenience retailing in the north of the city other than in some of the larger expansion areas identified around Aberdeen at Grandhome, West Aberdeen/Countesswells and Newhills. Development for bulky goods at OP75 is intended to maintain diversity (not fill a deficiency) of offer in Bridge of Don should the North Denmore site be developed. Irrespective of the suitability of OP75, there is sufficient overall retail offer in the Bridge of Don/Denmore/Dubford area. There is no requirement for additional retail offer over and above what is already consented/allocated at North Denmore site, Dubford and Grandholme. Furthermore additional retail offer may adversely impact other retail

locations such as Beach Boulevard (CD16 (pages98-102)).

Land at Jesmond Drive

75: An application for planning permission in principle (P150369) for 19 affordable housing units with associated car parking and landscaping went before the Planning Development Management Committee on 16 July 2015 and was approved by Members, subject to conditions and a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended ('Section 75 agreement'). The Committee Report details both the complicated development management and development plan history covering the points raised by the respondent.

As a brief summary, planning applications A0/0624 and A4/0409 (RD48 and RD49) were granted conditional Outline Planning Permission with associated Section 75 agreements, but ensuring that 11,200 square metres was to be maintained as public open space in perpetuity (included the area subject to this representation).

A subsequent Reserved Matters application (05/1169) (RD50) was granted conditional consent for the formation and landscaping of the area of open space – this permission was partially implemented to provide pedestrian links, but no formal landscaping.

The Finalised Aberdeen Local Plan – Green Spaces – New Places 2004 (RD47 – see City Wide Proposals Map) identified the whole of the Jesmond Drive site as Urban Green Space and Green Space Network. In response to representations, the Council produced a series of Proposed Changes to the Finalised Plan and this included the identification of Jesmond Drive as an opportunity site for community facilities and the removal of Green Space Network from part of the site (RD70 Proposed Change G6, site Number 4 – see map)

The issue was considered at Public Local Inquiry in 2006 (CD45 – Volume 2, Issue 35 pages 2-67 to 2-71). Following receipt of the Reporter's Report, the Council Modified the Finalised Local Plan to show the land at Jesmond Drive as Opportunity Site 104 (Suitable for mixed uses including local shops, nursing home, amenity open space and paths complementary to adjacent amenity open space, and housing (approximate 40 units, of which about one third are expected to be provided by a housing association).

This was published in the Finalised Aberdeen Local Plan Proposed Modifications on 18 January 2008 (RD71 page 34 of 225, and see map 8). This showed Opportunity Site 104 as Mixed Use with both Green Space Network (in line with Reporter's Recommendation) and as Urban Green Space (contrary to Reporter's Recommendation). The Modifications made by the Council were publicised and all Objectors (including the Respondent) were notified. No objections were received.

The Aberdeen Local Plan 2008 was adopted on this basis.

No Objection was submitted to the allocation boundaries during the extant Aberdeen Local Development Plan 2012 cycle or the Examination. Representations were however received relating to concerns about the principle of OP11 (as it was named at that time) but no changes were made following the Examination. It is however worth noting that a closer review of the Proposals Map which accompanied the Local Development Plan 2012 reveals that the area of open space was not allocated as Green Space Network

The allocation and boundaries included within the Proposed Plan currently under Examination are the same as those within the extant Local Development Plan 2012, with the site to the south of the objection area identified for Mixed Use and the objection area itself designated as Urban Green Space. The OP11 label on the land to the south has been removed as the site is developed.

Fundamentally, at the time of the publication of the Proposed Plan, the Urban Green Space zoning was appropriate and wholly sufficient.

A further planning application (P151068) for the modification or discharge of the planning obligation regarding planning application A4/0409 in relation to Clause 2 (Open Space) is currently pending consideration by the Authority. We would however, expect the next iteration of the Local Development Plan to reflect this planning permission, assuming that a consent will have been issued by this point.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	ALTERNATIVE SITES: BRIDGE OF DON/GRANDHOME	4
Development plan reference:	No reference in the Plan	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Gary Purves of Knight Frank LLP on behalf of Avant Homes (31)
Mr Ian Livingston of Ryden LLP on behalf of University of Aberdeen (63)
A & G Cowie (71)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of North East Scotland College (109)
Mr Scott Leitch of Halliday Fraser Munro on behalf of Langer Investments (118)
Mr Steve Crawford of Halliday Fraser Munro on behalf of Drum Property Group (150)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Mr Bob Reid of Halliday Fraser Munro on behalf of Mr John McIntosh (156)

Provision of the Development Plan to which the issue relates:	Alternative sites in Bridge of Don/Grandhome

Summary of the representation(s):

Mill of Mundurno

31: Remove land adjacent to Mill of Mundurno from Green Belt and allocate for housing. Site is logical and compact expansion of Dubford close to employment sources and accessible to public transport routes. Within close proximity of Aberdeen Western Peripheral Route northern terminus and Aberdeen Exhibition and Conference Centre. Located within Energetica Corridor. Site would be well contained within landscape, would not lead to coalescence. 25% of units would be affordable. Schools in area have declining school roll or are operating at less than capacity. Issues relating to integration with existing developments, linear crop marks and drainage can be addressed at planning application stage.

Land at Balgownie (B0203)

63: Object to failure to identify land at Balgownie as a mixed use development incorporating residential, employment and recreational land. Land is surplus to requirement and its redevelopment will contribute to the consolidation/improvement of the Universities' estate infrastructure across Aberdeen. Aberdeen Sports Village (ASV) now provides a base for the sporting facilities and as such land at Balgownie is now surplus.

Residential land use in the vicinity is acceptable to the council with two development sites identified in the Proposed Plan at OP11 and OP12. One is under construction and the other has an application pending.

Proposal will result in 50% recreational/open space with the remainder as employment/residential use. Redevelopment of the land would deliver a sustainable development in the right location in line with Scottish Planning Policy (para 40).

Site would positively impact on the Energetica Corridor and enable expansion of the Aberdeen Science and Technology Park. Site is located within the Aberdeen City Strategic Growth Area. Site will be very accessible after the Third Don Crossing is complete. Core Path network paths are within close proximity. There is a shortfall in housing numbers and this site will help meet the shortfall. Site is effective and capable of delivery. The allocated sites are large and constrained.

Persley Croft (B0101)

71: Include land at Persley Croft in the Local Development Plan. Located in popular area of the city within close proximity to Aberdeen airport/industrial sites in Bridge of Don and Dyce and has good connections to Aberdeen City Centre. Ideal location for variety of uses (housing, hotel, retail, commerce or industry).

Issues of access are not insurmountable. There are options to create adequate access. There is scope to access land from the west of the site which would be of mutual benefit to the Grandhome development. A potential third access (south of the site) has not been fully investigated by the Council - adequate room to create and improve upon existing access point.

All surrounding land has been included in the Local Development Plan. Site was originally part of the Grandhome estate which has been included in the Local Development Plan. Majority of Green Belt zoning has been lifted - not reasonable to consider the site at Persley to be different.

Development would prevent site becoming more derelict and increased negative impact visually and on adjacent housing developments. Site target for vandals.

Support for site by local councillors and MSP. Community Council in favour of tidying up the area.

Mundurno (B0202)

85: Object to failure to identify site B0202 at Mundurno for development of mixed use sustainable community (1000 houses, retail/business hub and community facilities - single stream primary school and playfield fields).

Commitment to delivery of AWPR and Third Don Crossing has material implications for the Bridge of Don Area and the proposed site.

Continued assertion that the site performs Green Belt functions (contributing to identify and landscape setting of city, preventing coalescence between Bridge of Don and Potterton) is refuted. Site is located 2 kilometres from Potterton and is not visually connected. Construction of AWPR to north of site negates any prospect of

coalescence. The AWPR will entirely alter the character of the area.

Site lies within the city (Strategic Growth Area) and anchors the Energetica Corridor. Site is well served by public transport with good (and improving) access. Additional housing is required to be identified in the area to improve the integration of housing and employment uses and encourage sustainable walking and cycling linkages between the two.

Land at Shielhill (B0206)

118: Objection to non-allocation of site B0206. Site proposal has been refined and is now proposed as key worker housing for 250 houses (site previously promoted as a sand and gravel quarry and for affordable housing).

Site is brownfield, lies within Energetica Corridor and is of low ecological value. No evidence of supported species. There will be a good landscape fit, high quality amenity areas and enhanced pedestrian links. Site is accessible to AWPR, Bridge of Don and Dyce employment centres and existing established residential areas.

There is a clear need and demand for housing (especially medium income housing). The houses will be: 100% of these will be affordable - available to a range of people in need; 25% of these will be made available to those on the Council housing waiting list; 75% of these will be sold at a 30% discount from open market value, to be made available to key workers, public sector / NHS / Council employees; A discount of at least 20% will be applied in perpetuity in relation to subsequent sales; 10 Homes for Heroes are proposed, with associated 30 square metres workshops.

Causewayend (B0210)

150: Site promoted as bid site but was not supported as the Planning Authority believed they had allocated enough housing sites in line with the Strategic Development Plan. The MIR site review failed to recognise the opportunity and suitability of the site for development. It is contended that this is not the case. The negative reasons suggested in respect of the site are incorrect. Currently zoned as Green Space Network and Green Belt but it would be more appropriate for housing.

The site makes a sensible extension to Bridge of Don. The site falls within the southern section of the Energetica Corridor and could help deliver housing to support economic development.

Site is immediately adjacent to northern section of Bridge of Don’s urban area covering approximately 34 acres of unused agricultural land. Ground is flat with no physical constraints. Landscape impact will be limited due to it sitting in a bowl and it will be a logical extension to existing built up area. Dry stone dyke located on sections of the boundary can be used to create a strong boundary which would be stronger than any features on the current green belt boundary. These will help integrate the proposed development into the landscape. Site sits in a bowl in the landscape reducing any local impacts. Small proportion of site is wooded – other sites in close proximity (Grandhome) were not discounted as they contained woodland. The site has no nature conservation designations. Contrary to the Main

Issues Report evaluation there can be no significant loss or disruption to natural conservation.

New access can be taken from eastern boundary. Development to the south has been designed to provide access to the site. The Council have recognised that the site is within 500 metres of a bus link and there is scope for a cycle and footpath link between the existing housing and the proposed site. The primary school is within 800 metres. Local facilities are close and no worse than any other part of the Bridge of Don.

The Grandhome development will improve facilities and employment opportunities within this part of the city. Other local roads will be upgraded due to the AWPR.

Shielhill Farm (B0205)

152: Shielhill Farm should be allocated for residential and mixed-use development in order to bring forward land in an appropriate location capable of delivering effective housing land in the first period of the Local Development Plan. Land at Shielhill Farm can contribute to the long-term growth requirements of the area.

Land can accommodate approximately 1,000 homes commencing 2020 at a rate of 100 per annum. A mixed use development is proposed for the site. It will be influenced by the masterplanning process. Allocation at Shielhill Farm will complement existing mixed use site at OP10 Dubford.

Site is well related to existing and emerging development context of the Bridge of Don area. Also well placed in terms of connectivity (south side of AWPR, west of A90 and Energetica Corridor).

Land at Perwinnes/North of Don Masterplan (B0209)

156: Object to non-allocation of B0209 - North of the Don Masterplan for a mixed community of 2000-3000 homes. Any constraints to the North of the Don Masterplan are principally policy based rather than technical. The few technical issues which exist are common to any larger scale development. They are all capable of resolution.

There are minimal facilities in Bridge of Don - suburban town of 36,000 population. There has been no consideration of a substantial District Centre of strategic significance which could provide much of the local services and facilities and jobs that a settlement of this scale would normally justify. Once Grandhome is built an additional 15,000 - 18,000 population will be located in Bridge of Don. Congestion in the City Centre is at levels that the possibility of a local centre to serve a wider set of Town Centre needs could make sense for Bridge of Don, benefiting the City Region as a whole.

A masterplanned Town Centre for Bridge of Don is required. There is no rationale which would justify housing land constraint in the face of sensible masterplanning of places, infrastructure and facilities. Arguments made in the past by the North East of

Scotland Transport Partnership (Nestrans) that a route through Bridge of Don could undermine the AWPR Northern Leg no longer apply as the AWPR is now underway. A public transport loop (set out in North of the Don Masterplan) which links across the Third Don Crossing to University and Science Parks makes sense in planning terms with potential for dedicated hydrogen bus loop. The masterplan complements Energetica.

OP7 Aberdeen College Gordon Street

109: Support for continuing allocation of site. However not all of the former campus has been included within the OP7 designation. The Gordon Centre has not been used by North East Scotland College (NESCOL) for teaching facilities since 2011, is no longer required for teaching purposes and its redevelopment of the larger site will form part of NESCOL's strategic plan going forward.

Modifications sought by those submitting representations:

Mill of Mundurno

31: Remove land adjacent to Mill of Mundurno from Green Belt and Green Space Network and identify as a greenfield allocation post 2017.

Land at Balgownie (B0203)

63: Rezone to Mixed Use development encompassing expansion of Aberdeen Science & Technology Park, student and key worker accommodation and recreational/open space.

Persley Croft (B0101)

71: Site at Persley Croft to be included in the LDP.

Mundurno (B0202)

85: Site should be allocated to accommodate 500 houses in each phase of the Plan (1,000 in total) with associated ancillary uses and community facilities. Consequential changes to Proposals Map, Bridge of Don/Grandhome growth area, Tables 2 and 3 of the Proposed Plan and additional consequential amendments to text.

Land at Shielhill (B0206)

118: Land at Shielhill is removed from the Green Belt/Green Space Network zoning and allocated as an 'Opportunity Site' suitable for up to 250 key worker houses. Allocation to be subject to Masterplan to be agreed with the Planning Authority.

Causewayend (B0210)

150: Identify site to help delivery housing land now or into the future as a draw-down site should the failure to deliver the current allocations continue.

Shielhill Farm (B0205)

152: Remove the Green Belt designation and allocate phased residential development for approximately 1,000 houses and other Mixed Use development with anticipated commencement in 2020.

Land at Perwinnes/North of Don Masterplan (B0209)

156: Allocate the site or identify it as strategic reserve.

OP7 Aberdeen College Gordon Street

109: Request that boundary be extended (as per plan attached to representation) and site be identified as an Opportunity for mixed use.

Summary of response (including reasons) by planning authority:

General Strategy

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30 and CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2013 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

Mill of Mundurno

31: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 11). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The B999 to the south of the site is a very busy road which helps to form a clear, robust and defensible Green Belt

boundary. Developing north of the B999 (above and beyond the existing Premier Inn development) would extend the built up area into open countryside. Residential development on this site would intrude significantly into the surrounding landscape. The site is isolated from local facilities and there are few sustainable transport options, making any development in this location heavily car reliant. This land should therefore remain as Green Belt.

Land at Balgownie (B0203)

63: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 9). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The Green Space Network and Urban Green Space designations remain appropriate. The site is central to the Bridge of Don area and is easily accessible to local residents. The population will grow when the Proposed Plan allocations are implemented. This will generate an increased need for open space/playing fields. We acknowledge the improved facilities at Aberdeen Sports Village, however, these cannot compensate for the loss of local provision at Bridge of Don. While the University may no longer have a requirement for its own use, there is no evidence to suggest that there isn't a wider community requirement for this area of open space to be retained.

Scottish Planning Policy (SPP) (CD05, paragraph 226) allows for playing fields to be redeveloped where, among other reasons, a relevant strategy and consultation with **sport**scotland show that there is a clear excess of provision to meet current and anticipated demand in the area. This has not been demonstrated. SPP, paragraph 224, states that "Local Development Plans should identify and protect open space identified in the open space audit." This site is identified in the Council's Open Space Audit 2010 (CD41 pg 100). The site is close to public transport and core paths, which reinforces its importance within the Green Space Network and the opportunity it presents for recreational use. Although the Third Don Crossing route runs close by there will be no direct vehicle access to the site.

Persley Croft (B0101)

71: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is subject to significant constraints regarding access. The site is considered to be undesirable for development due to its location directly on the A90 Trunk Road (The Parkway), which is a major transport route. The Parkway severs the site from nearby residential development, services and facilities at Danestone, and would be very difficult and hazardous for pedestrians and cyclists to cross. The Parkway is a robust Green Belt boundary in this area. Considering the plans for development at Grandhome, it cannot be assumed that this road will become a significantly quieter local road post-Aberdeen Western Peripheral Route (AWPR). The responsibility of upkeep and maintenance of land lies with the landowner and is not a matter for the Development Plan process.

Mundurno (B0202)

85: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 11). Aberdeen City Council has reassessed this site, again considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is currently zoned as Green Belt and Green Space Network and performs its Green Belt functions by contributing to the identity and landscape setting of the city, and preventing coalescence between Bridge of Don and Potterton. It is isolated from the existing settlement of Denmore by the B999 and topographical changes. Local primary schools could not cater for the demand generated by a development of this size. It is unlikely this scale of development could support the necessary neighbourhood facilities and services to significantly reduce residents' need to travel. There is no requirement for this site in addition to the Dubford site and other Bridge of Don sites.

Land at Shielhill (B0206)

118: We do not propose to allocate this site for development. The site was previously considered during the Pre-Main Issues Report (Pre-MIR) stage and rejected as being unsuitable for development as a Quarry, as set out in the Pre-MIR Development Options Assessment Report (CD28). Aberdeen City Council has reassessed this site based on the updated proposal for residential use, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). This site lies to the west of the Dubford development. The Green Belt Review (CD38, pages 4-6 of 30) which supported the extant Aberdeen Local Development Plan 2012 found that the edge between Dubford and the proposed land at Shielhill site forms a clear boundary with a pronounced difference in vegetation between the gorse and heathland to the west and the improved grassland to the east. Residential development on this site would intrude significantly into the surrounding landscape. The site sits in an elevated position and is visible from a considerable distance. The site is isolated from local facilities and there are few sustainable transport options, making any development in this location heavily car reliant. The site lies within the Scotstown Local Nature Conservation Site (LNCS). This land should remain as Green Belt.

Causewayend (B0210)

150: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 84). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Development on this site would have a severe impact on the surrounding landscape and weaken the defensible Green Belt boundary to the north of the city. The views from the B997 Scotstown Road would be prominent. The site is not well integrated with the existing settlement and it is thought that it would be difficult to link a new road between existing settlements to the south at Woodcroft to the proposed development. Consequently road access would need to be made on to the road to the north of the site and this may have safety implications. There would be some concern for pedestrians or cyclists aiming to

avoid the use of the car. This could lead to increased car dependency which is against policies described in national, regional and local policy. Alternative sites in more appropriate and sustainable locations throughout the city have been identified. These allocations meet the requirements set out in the SDP. Sufficient allocations have already been made in the Bridge of Don area to support the Energetica Corridor.

Shielhill Farm (B0205)

152: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is currently zoned as Green Belt and Green Space Network and performs its Green Belt functions by contributing to the identity and landscape setting of the city, and preventing coalescence between Bridge of Don and Potterton. It is relatively remote from existing facilities. Local primary schools could not cater for the demand generated by a development of this size. It is unlikely this scale of development could support the necessary neighbourhood facilities and services to significantly reduce residents' need to travel. There is no requirement for this site in addition to the Dubford site and other Bridge of Don sites.

Land at Perwinnes/North of Don Masterplan (B0209)

156: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 11). Aberdeen City Council has reassessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The proposal would have an impact on the overall Spatial Strategy of the Proposed Plan and would require a major reassessment of the proposed sites across the entire city. Many of the aims of the North of Don Masterplan are equally achievable by masterplanning the sites which are already allocated in the Proposed Plan. Having such a high proportion of allocations in the Bridge of Don area would reduce the choice of sites available elsewhere in the city and may prove more difficult to deliver the required development within the timescales envisaged. The site is deemed undesirable as it is open farmland and is a highly visible exposed hill. The hill is a landmark that provides a backdrop to development at Bridge of Don and helps to contain it. The site is poor in access terms, although it may be large enough to support its own services, facilities and public transport. However, development breaking out over the lower ground to the south before climbing up Perwinnes Hill would add a sense of urban sprawl and isolation unconnected to the existing urban area. Sufficient allocations have already been made in the Bridge of Don area to support the Energetica Corridor.

OP7 Aberdeen College Gordon Street

109: The extent of the boundary in the Proposed Plan is the same as in the extant Local Development Plan 2012 (CD42). No submission, bid for development, or indication of a desire to amend the zoning has been submitted until this point in the

Development Plan preparation cycle.

Insufficient detail has been provided with regard to the type of mixed use which may be proposed on the site. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). In light of the adjacent primarily residential land uses it would not appropriate to rezone the land as Mixed Use where there is uncertainty as to the type of uses proposed.

The boundary of Proposed Plan site OP7 Aberdeen College Gordon Centre should remain as proposed. The site is made up of redundant, unused land and buildings which Aberdeen College would like to see redeveloped in the future. The Opportunity Site is currently covered by residential designation (under Proposed Plan Policy H1 – Residential Areas). The remaining area owned by North East Scotland College (NESCOL) to the west of the site is also covered by a residential designation (Proposed Plan Policy H1). Proposed Plan Policy H1 states that new residential development will be approved in principle if it meets certain criteria relating to amenity. NESCOL would be able to redevelop the site to a complimentary use if the proposal was in accordance with the corresponding policies within the adopted Local Development Plan.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	ALLOCATED SITES & GENERAL AREA STRATEGY: DYCE, BUCKSBURN & WOODSIDE	5
Development plan reference:	Pages 11-12; Pages 80-82; Proposals Map; Appendix 2; Appendix 4; Appendix 6; Masterplan Table Page 38	

Body or person(s) submitting a representation raising the issue (reference no.):

Mrs Evelyn Clark (14)
Mrs Evelyn Clark on behalf of Rented Accommodation (15)
Mrs Susan Fraser (19)
Mrs Sandra Rae (20)
Mr Gordon MacCallum of Keppie Planning Ltd on behalf of CALA Management Ltd and SRUC (24)
Mr Hugh Cumming (32)
Mr & Mrs Ewen (48)
Mr Rab Dickson of the North East of Scotland Transport Partnership (59)
Mr Michael Lorimer of Ryden LLP on behalf of The University of Aberdeen/ Bon Accord Land Promotion Ltd (73)
Mrs Pippa Gardner of Progress Planning Consultancy Ltd on behalf of Miller Development Ltd (74)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Overview of Direction for Growth in this area and specific OP sites

Summary of the representation(s):

Land Supply

OP21 Rowett South

73: To be consistent with the Strategic Development Plan the full allocation of 1940 units should be allocated within the Local Development Plan. Constraints on site due to the Council postponing the determination of pending applications within the Newhills Expansion Area and Dyce Drive Corridor until a cumulative impact assessment was undertaken and infrastructure requirements established. Build rates have been pushed back. University request that the 240 units within Phase 2 be brought forward to Phase 1 allocation.

OP23 Dyce Drive

74: Welcome the Land Release Strategy. OP23 has been omitted from the Table and no detailed reference to its contribution to the development of land supply is provided. This is important in representing the land supply in this location correctly.

Shortfall of Units

183: The 2015 Housing Land Audit suggested the delivery rate anticipated in the Plan will not be achieved. There is a shortfall of 2,290 units in this area

OP18 Craibstone North and Walton Farm

24: Object to allocation. Employment land in this corridor is in excess of the Structure Plan requirement of 60 hectares available at all times. Dyce Drive and Rowett North will meet the requirements. The site will not be required by 2027 and its continued reservation is having a blighting effect for no productive or sustainable reason. Assumed as generating traffic in Newhills traffic model by 2023 but the LDP doesn't envisage development until past 2027. This requires clarification.

OP14 Bankhead Academy

19: Respondent's home, Bankhead School Lodge, is within the boundary of the site. Request to remove this from the Opportunity Site.

OP86 Dyce Railway Station Objection

14, 15, 20, 32, 48: on the basis of loss of amenity space and open views. Car parking close to rear of properties. Negative impact on residents through noise and disturbance, especially at night, possible increase in anti-social behaviour and overlooking. Increase in traffic, light pollution and possible damage to residential properties. Union Row and Station Road not suitable for an increase in traffic.

Access - 20, 32: No access or detail given on the car park entrance.

Support - 59: Welcome allocation of the site. The North East of Scotland Transport Partnership (Nestrans) have commissioned a study to support this allocation. It includes background and context; demand; consultations; objectives; appraisal of options; design of car park and next steps.

Modifications sought by those submitting representations:

Land Supply

OP21 Rowett South

73: The full allocation of 1940 units should be allocated in the next Local Development Plan.

OP23 Dyce Drive

74: Amendment to Table 4 of the Proposed Plan to record Dyce Drive as an active development site.

Shortfall of Units

183: Additional housing sites need to be allocated.

OP18 Craibstone North and Walton Farm

24: Re-allocate the site as mixed use, residential and educational. Remove as a reserved site for employment uses. This will avoid planning blight and assist the proposals the shorter-term allocated sites OP19 and OP23.

OP14 Bankhead Academy

19: Bankhead School Lodge removed out of the boundary of the proposed site.

OP86 Dyce Railway Station

14, 15: Leave it as green space. If car park goes ahead ensure space between the houses, walls and car park.

20: More parking restrictions.

32: Respondent would like the opportunity to purchase land behind his property to provide a buffer between his house and the proposed car park.

Summary of response (including reasons) by planning authority:

Land Supply

<u>OP21 Rowett South</u>

73: As discussed in Issues 2, we contend that the Proposed Plan is consistent with the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12). Table 2 of the Proposed Plan (page 9) shows that up to the period 2026 the Proposed Plan allocates 16,982 greenfield homes. This is 18 homes short of the 17,000 SDP allowance over the same period. The 0.1% shortfall is not considered to be of any material significance and therefore it is not considered necessary to bring forward the 240 homes within Phase 2 to the Phase 1 allocation for Rowett South. The SDP is also clear (in paragraph 5.5), that in exceptional circumstances planning permission can be granted on sites within the 2027-2035 period. Work is currently underway on a transport study in the area and until the completion of this study it would also be premature to make any changes to the phasing.

<u>OP23 Dyce Drive</u>

74: Proposed Plan site OP23 is not included in Table 4 of the Proposed Plan because it was identified in the Aberdeen Local Plan 2008 (CD43). It therefore pre-dates the allocations that have arisen out of the Aberdeen City and Shire Strategic

Development Plan 2014 and the Aberdeen City and Shire Structure Plan 2009 (CD19). It is still proposed as an Opportunity Site because parts of the site are undeveloped and still have to obtain planning consent.

Shortfall of Units

183: The issue regarding any shortfall of housing units is addressed within Issue 2: Housing and Employment Land Supply.

Sites

In preparing the Proposed Plan a Development Options Assessment (CD28/30/31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP.

OP18 Craibstone North and Walton Farm

24: This site was chosen following a rigorous assessment of all proposed development options during the preparation of the extant Local Development Plan 2012. It was found to be ideally located for employment development particularly, due to the existing allocations for employment land and Park & Choose in the immediate area. At the Examination into the extant Local Development Plan 2012 the Reporter found the site to be suitable for development. In the Examination report (CD13, Issue 14) the Reporter recognised that, in order to guarantee the availability of the employment land target set out by the Strategic Development Plan, an over-allocation for the Plan period is appropriate. Paragraph 2.16 of the Proposed Plan states that “The overall allocations are more than required by the Strategic Development Plan. It is important to take account of factors that will reduce the actual developable area of employment land such as strategic landscaping, the presence of pylons or other uses within zoned sites and land required for transportation”. Therefore a change in the zoning of this site to that of mixed use, residential and educational is considered to be unnecessary. In relation to traffic modelling, the site is identified for 1.5 hectares up to 2027 and 18.5 hectares post 2027. The plan is therefore clear that regardless of separate traffic modelling projects the site is not due to come forward until 2027.

OP14 Bankhead Academy

19: It is not the purpose of the Local Development Plan Proposals Map to make a distinction between private and public property. The map is intended to show land use zonings and allocations for new development sites across the city. The identification of a property such Bankhead School Lodge within an Opportunity Site does not force the landowner to develop the site but simply identifies that the site is suitable for development for the identified purpose. No change is therefore proposed.

OP86 Dyce Railway Station

59: Support for OP86 is welcomed. The existing car park and surrounding streets have a limited capacity of 82 spaces (RD72). A recent report prepared for the North East of Scotland Transport Partnership (Nestrans), Dyce Rail Station Car Park – Initial Appraisal (RD72), has shown that the available car parking is reaching capacity and that with improvement works due to be undertaken by Network rail demand could reach 164 spaces by 2035.

The current situation has resulted in a reasonable amount of on-street parking in the vicinity that could be attributed to commuters. Scottish Planning Policy (SPP) Para 275 (CD05) is clear that Development Plans are required to identify rail infrastructure and support its delivery. Within National Planning Framework 3 (CD04) there is programmed investment in the Aberdeen to Inverness rail line including improvements between Aberdeen and Inverurie due to be complete by 2019. With these improvements now committed, as noted earlier demand at Dyce Railway Station is likely to increase. Through the Nestrans Regional Transport Strategy Refresh, approved by ministers January 2014, the section in relation to Rail (IC1), on page 24, (RD51) actively promotes commuter rail travel. Dyce Railway Station forms a key part of this network. The provision of the car park will encourage and promote a sustainable transport method and help to alleviate parking congestion in the area.

14, 15, 20, 32, 48: Issues in relation to the layout of the car park and the impacts of noise, light, overlooking etc. will all be considered as part of any future planning application. The provision of buffer strips and landscape to protect the amenity of the surrounding residences will be considered at that time. Issues in relation to Anti Social Behaviour are a matter for the police however the provision of a formal managed carpark will likely discourage the type of anti social behaviour that could take place on the current unmanaged open space.

Access – 20, 32: As the proposal is an extension to the existing car park, details surrounding access are more appropriately dealt with at the planning application stage and not within the Proposed Plan.

Purchase of Land – 32: The Local Development Plan does not cover matters involving the buying and selling of land.

Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	ALTERNATIVE SITES: DYCE, BUCKSBURN & WOODSIDE	6
Development plan reference:	No reference in the Plan	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Ian Livingston of Ryden LLP on behalf of University of Aberdeen (63)
Mr Anthony Aiken of Colliers International on behalf of MacTaggart and Mickel Homes (123)
Ms Meabhann Crowe of Colliers on behalf of MacTaggart and Mickel Homes and Mr Fabrizio Necchi (163)
Mr Simon Pallant of Scottish Government Planning and Architecture Division on behalf of Transport Scotland (167)
Mr Colin Fraser of Park Home Estates (170)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Alternative sites in Dyce, Bucksburn & Woodside

Summary of the representation(s):

Land at Hillhead Centre (B0601)

63: Object to the land at Hillhead Centre not being included as an Opportunity Site for residential development on the basis that, the site should not be identified as Green Belt, is close to the University, is a brownfield site and due to the shortfall in housing numbers.

Lands adjacent to Bucksburn Primary School (B0102)

123: Object to the lands adjacent to Bucksburn Primary School not being included as an Opportunity Site for residential development on the basis that, the site is well connected to services, it should not be identified as Green Belt or Green Space Network (and that these issues can be addressed through landscaping), that the site was previously identified in the Proposed Local Development Plan 2010 and only removed at Examination, that the site could help improve biodiversity and that site could address housing need in the short to medium term.

Land South and West of Bucksburn Primary School

163: Object to the land South and West of Bucksburn Primary School not being included as an Opportunity Site for residential development, on the basis that the site is well connected to services, should not be identified as Green Belt or Green Space Network (and that these issues can be addressed through landscaping), that the site was previously identified in the Proposed Local Development Plan 2010 and only removed at Examination, that the site could help improve biodiversity and that site

could address housing need in the short to medium term.

Green Belt and Green Space Network

163: There should be a review of the Green Belt and Green Space Network.

Housing Land Supply

163: Reference to how shortfalls from the Masterplan Zone developments are to be dealt should be included in the Proposed Plan.

Dyce Transport Study

167: Suggestion that details of the ongoing cumulative microsimulation transport modelling of land allocations adjacent to the A96T near Dyce, should be included in the Action Programme.

Cairnfield Place

170: Proposal to rezone land off Cairnfield Place, Bucksburn as residential or mixed use.

Persley Park

170: Proposal to rezone Persley Park Mobile Home Park as Residential or Mixed Use on the grounds that the identification of the site as Green Belt is no longer appropriate, that the site will remain developed as a Mobile Home Park regardless of its status in the Plan and due to changes in the level of development in the surrounding area.

Clinterty (B0104)

183: Object to the non-allocation of Clinterty (B0104) for approximately 100 houses and associated facilities on the grounds that, the site should not be identified as Green Belt, that the site will consolidate a scattered group of houses and will make up for constrained housing supplies in the area.

Modifications sought by those submitting representations:

Land at Hillhead Centre (B0601)

63: The site should be identified for residential development and open space provision, incorporating student and key workers accommodation.

Lands adjacent to Bucksburn Primary School (B0102)

123: Include land at Bucksburn as a site for residential development in the Proposed Plan. Remove the Green Space Network designation at land at Bucksbum to allow

for sensitive residential development to take place and green networks to be created and enhanced via a well-designed and appropriate landscape framework. The Green Belt boundary as depicted on the Proposed City Wide Proposals Map reviewed to exclude land at Bucksburn and create a stronger boundary between the built form and the Green Belt beyond.

Land South and West of Bucksburn Primary School (B0102)

163: Include land at Bucksburn as a site for residential development in the emerging Local Development Plan.

Green Belt and Green Space Network

163: Review how the Masterplan Zones (particularly Zone 3 and 4) affect the area of Bucksburn. Have a review of the Green Belt and Green Space Network to assist in linking these Zones without detrimentally affecting the small area of Bucksburn which has been omitted from either Zone. Form a robust, defined Green Belt boundary linking Masterplan Zones 3 and 4, which will allow for small-scale development/infill to take place on our client's site (land at Bucksburn).

Housing Land Supply

163: Include reference to how shortfalls from the masterplan zone developments are to be dealt with as the Plan progresses.

Dyce Transport Study

167: The Proposed Plan Action Programme should be amended to recognise the on-going study of the cumulative impacts of the allocations within the Dyce area, the associated transport constraints and the likely nature, scale and cost of transport interventions required to support the delivery of these allocations.

Cairnfield Place

170: Change classification (from yellow with black dots) to Residential or Mixed Use.

Persley Park

170: Change zoning from Green Belt/Brownfield to Residential or Mixed Use.

Clinterty (B0104)

183: Remove Clintery from the Green Belt and allocate as a small scale, up to 100 houses, development with local services.

Summary of response (including reasons) by planning authority:

In preparing the Proposed Plan a Development Options Assessment (CD28/30/31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

Land at Hillhead Centre (B0601)

63: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The proposal would lead to the loss of open space and tree cover in the Old Aberdeen Conservation Area. The site is also classified as Green Belt and Green Space Network. In terms of school capacity, St Machar Academy is due to reach capacity by 2022 and Seaton Primary is currently over capacity at 112% in 2015 (CD32).

Lands adjacent to Bucksburn Primary School (B0102)

123: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter who recommended that this site (known then as OP27) should remain as Green Belt and part of the Green Space Network “to ensure a robust defensible green belt boundary for this part of Bucksburn”. (CD13, Issue 18). Aberdeen City Council have reassessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). While the site is in a relatively sustainable location with access to services there is no clear access to the site for vehicular traffic with an already constrained access point to the school from the A96. The topography of the site would also make development challenging in terms of layout, and as the site is within the Airport Contour Zone there may be restrictions on building heights. In terms of school capacity, Bucksburn Academy is due to reach capacity by 2020 and Brimmond Primary by 2018 (CD32).

Land South and West of Bucksburn Primary School

163: The representation suggests that this site was included in the Proposed Local Development Plan 2010 (known then as OP27 (refer text above)) and subsequently removed by the Reporter at Examination, which is incorrect. The site is adjacent to the OP27 site (Lands adjacent to Bucksburn School) which was removed by the Reporter, and the site subject to this representation did not form part of that allocation.

We do not propose to allocate this site for development. This site was not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. It has therefore only been proposed as a representation to the Proposed Plan. Aberdeen City Council has assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Many of the site constraints from the adjoining site (discussed above) also apply to this site. The topography of this site is extremely challenging with a very steep incline for the majority of the site (approximately 1:6). Vehicular access would be particularly difficult due to this incline as would the site layout. The site is within the Airport Contour Zone which may restrict building heights and is also identified as potential contaminated land from a former quarry. In terms of school capacity, Bucksburn Academy is due to reach capacity by 2020, and Brimmond Primary by 2018 (CD32).

Green Belt and Green Space Network

163: The issue of the boundary of the Green Space Network is dealt with in Issue 30 Policy NE1: Green Space Network and the boundary of the Green Belt is dealt with in Issue 31 Policy NE2: Green Belt.

Housing Land Supply

163: The issue of Housing Land Supply is dealt with in Issue 2 Housing and Employment Land Supply and Policy LR1.

Dyce Transport Study

167 At the time of preparing the Proposed Plan the scope of the transport study at Dyce was still being investigated. While an outline of the scope of the project and the expected detail are included in Proposed Supplementary Guidance Developer Obligations (CD25), it is proposed to significantly increase this detail prior to adoption of the Supplementary Guidance and once the study is complete. The development industry has been fully engaged with the study from the outset, and has provided significant assistance including working on draft legal agreements (under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended) and costings for developments in the surrounding area. The inclusion sought by the respondent in relation to the Proposed Action Programme (CD47) is reasonable. It is proposed to make the modification sought prior to adoption of the Proposed Action Programme.

Cairnfield Place

170: Land off Cairnfield Place is currently identified as Mixed Use, as is requested by the representation. The 'green dots' represent Green Space Network which would need to be considered as part of any future development of the site. Proposed Plan Policies H2 Mixed Use Areas and NE1 Green Space Network set out details of what development is acceptable in this regard. No action is therefore required.

Persley Park

170: This site was not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. It has therefore only been proposed as a representation to the Proposed Plan. We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). While the site is in a relatively sustainable location, close to some services and facilities, it is very prominent from the A90 which forms a strong boundary for the Green Belt. The existing Mobile Home Park is low density and very well screened and, as such, it has a very limited visual impact. Development on the site would have a negative impact on the Dyce Valley Prime Landscape Area and the adjacent River Don Corridor Local Nature Conservation Site. It would also weaken the strong Green Belt boundary that is formed by the A90. In terms of school capacity, Bucksburn Academy is due to reach capacity, by 2020 and Brimmond Primary by 2018 (CD32).

Clinterty (B0104)

183: Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31) Whilst the site could potentially be developed and is free from absolute constraints, it is divorced from Aberdeen with no local services or transport links, and providing such links for walking, cycling and public transport would be difficult. The issue of housing land supply is dealt with in Issue 1 Vision and Spatial Strategy.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	ALLOCATED SITES & GENERAL AREA STRATEGY: KINGSWELLS & GREENFERNS	7
Development plan reference:	Pages 12-13, Pages 82-83, Proposals Map, Table 5, Table 5 notes, Appendix 2, Appendix 4: Masterplan Zones Table	

Body or person(s) submitting a representation raising the issue (reference no.):

Mrs Elizabeth Reid of Albion Boarding Kennels (53)
Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of EnerMech Group Limited (81)
Ms Christine Dalziel of Halliday Fraser Munro on behalf of Drum Kingswells Business Park Ltd (134)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Mr Ian Cox of Kingswells Community Council (177)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Overview of Direction for Growth in this area and specific Opportunity Sites

Summary of the representation(s):

OP31 Maidencraig South East

53: Object to residential development on this site due to the fact that there is an existing boarding kennel business within the site. The boarding kennels could cause loss of privacy for local residents, and potential noise and disturbance issues.

OP33 Greenferns

81: Supports the continued allocation of OP33 for mixed use development. Seeks the removal of Green Space Network designation from the campus area. Seeks the following changes to the Development Framework - the EnerMech campus should not be identified as an area of residential use. The blocks currently identified as 'C' and 'I' should be zoned for the expanded EnerMech campus. Phasing should also be altered to include areas C and I within the first phase of the development, and the local distributor road should be constructed in its entirety from Provost Fraser Drive to Provost Rust Drive.

OP63 Prime Four Extension

134: Support the site's inclusion in the Proposed Plan as a Specialist Employment area.

136: The existing design for the Prime Four Extension is very low density and could be increased. The site appears to be car oriented which is disappointing.

177: Objects to the inclusion of OP63 in the Proposed Plan on the following

grounds. The site was considered as "undesirable" in the Aberdeen Local Development Plan Main Issues Report due to it's intrusion into the surrounding landscape and there being insufficient over-riding benefits to justify its allocation for development.

The developer for this site has argued that their Phase 4 site is isolated from the road network and will be difficult to develop even when AWPR is in place. This temporary isolation of the Phase 4 site should not be used as a reason to press for inclusion of OP63 in the Plan. This access issue has only been highlighted as a problem post MIR despite the site being identified on plans for at least 4 years.

The developer for this site is seeking to expand their overall land allocation. The developer has not said they wish to substitute OP63 for the Phase 4 site and intends to develop both sites when access becomes available. Aberdeen City Council should not be supporting this as the combined land allocation exceeds the requirements of the Strategic Development Plan.

The inclusion of OP63 as an additional site will have a serious visual impact on the local landscape, damage the natural environment and have an adverse impact on the local road traffic.

Access for Phase 4 can be achieved through the existing road network within Prime Four. The developer has expressed a preference to access Phase 4 (and OP63) from the AWPR. However this would result in additional traffic congestion.

Aberdeen City Council made it clear from the outset of the new ALDP that no additional employment land was required as the adopted ALDP already met the requirements of the Strategic Development Plan.

The ALDP must take account of the other large business park developments under construction in and around the city together with premises being vacated as employers re-locate to new developments. If OP63 is included in the Development Plan, then the Phase 4 site becomes immediately accessible by means of a shared access route.

The developer is pressing for OP63 to be included in the ALDP to justify the expense of an access from the AWPR.

OP63 is an elevated site and is clearly visible from Westhill and the A944. The Quaker Burial Ground sits prominently in one of the fields of OP63 and will be devalued by a backdrop of modern buildings. The Burial Ground gives the area uniqueness and sense of place.

OP63 is bounded by West Woods of Hatton to the east and north which is both Ancient Woodlands and a Local Nature Conservation Site. The majority of OP63 was previously designated as Green Space Network in recognition of its conservation and landscape value. Further development at OP63 will box in most of the Ancient Woodland and impact on its capacity to serve as a shelter and wildlife corridor.

Scottish Government ensured that the line of the AWPR avoided both the Burial Ground and Ancient Woodland. Respondent argues that Aberdeen City Council should not be prepared to ruin both sites now by allocating OP63 as a major development site.

Development at Kingswells and Greenferns

152: Table 5 of the Proposed Plan identifies the two main housing sites as Maidencraig (750 homes) and Greenferns (1,350 homes plus 10 hectares employment land). The housing land supply for this area is dependent on the deliverability of these two strategic sites. The allocation of the Kingswells East site for 80 homes would provide increased flexibility in the delivery of effective housing land. The Kingswells East site is well located in relation to existing settlement and planned expansion.

183: Only the Greenferns site is phased to continue into 2017 and onwards to 2035. The 2015 Housing Land Audit suggests that up to 2026 there will be a shortfall of 950 units. An additional 350 units need to be allocated to meet the Strategic Development Plan requirements for 2017-2026.

Modifications sought by those submitting representations:

OP33 Greenferns

81: Page 83 of the Plan should refer to the requirement to update the current Development Framework to identify EnerMech's campus within Greenferns as an area of commercial use, along with the areas of land which they have identified as suitable for their expansion plans. The Green Space Network should be removed from the campus, as it will restrict opportunities to develop the site. The detail of the development of the campus and the open space within the site should be determined as part of a masterplan for the EnerMech campus.

OP63 Prime Four Extension

177: Delete OP63 as a site for development.

Development at Kingswells and Greenferns

152: Include land at Kingswells East for 80 homes.

183: Additional housing sites need to be allocated for this area.

Summary of response (including reasons) by planning authority:

OP31 Maidencraig South East

53: The principle of development on this site has already been established. This site was Examined by Reporters as part of the Examination into the Aberdeen Local Development Plan 2012 (CD44, Issue 29) and has been carried forward into the Proposed Plan from the extant Local Development Plan (previously known as OP43). The Maidencraig Masterplan (RD52) was adopted as Supplementary Guidance to the extant Local Development Plan in March 2013, and sets out how this site, and the site to the north (Proposed OP32 Maidencraig North East), are to be developed. Page 3 of the Maidencraig Masterplan shows the area of land where the boarding kennel business is located as developed land. Detailed Planning Permission (P130491) was approved subject to conditions for the erection of 92 dwellings (Phase 1A) on 05 April 2013 and development is underway on site.

OP33 Greenferns

81: Support for Proposed Plan site OP33 Greenferns is welcomed and noted. The purpose of the Green Space Network is to maintain a strategic network of woodland and other habitats, active travel and recreation routes, greenspace links, watercourses and waterways, providing an enhanced setting for development and other land uses and improved opportunities for outdoor recreation, nature conservation and landscape enhancement. For this particular site, the Green Space Network designation covers the Bucksburn Local Nature Conservation Site. Proposed Plan Policy NE1 clearly states that, "Masterplanning of new developments should consider the existing areas of Green Space Network and identify new areas incorporating Green Space Network. Masterplans will determine the location, extent and configuration of the Green Space Network within the area, and its connectivity with the wider network." Appendix 2 of the Proposed Plan states in the 'Other Factors' section for OP33 that, "Proposals for a Special Needs School and extension to Enermec will need to be accommodated in a masterplan."

OP63 Prime Four Extension

134, 136, 177: Support for Proposed Plan site OP63 Prime Four Extension is welcomed and noted. Following the publication of the Aberdeen Local Development Plan Main Issues Report 2014 (CD29) in which OP63 Prime Four Extension was considered to be 'undesirable', several factors have come to light and been considered which have led to the designation of this site for development in the Proposed Plan. The south west corner of Proposed Plan site OP29 Prime Four Business Park is constrained and undevelopable at present due to access issues. The Prime Four Business Park has been exceptionally successful, bringing a significant positive economic impact to Aberdeen over the last 3 years. The developable land has been built out and demand for plots is continuing. There is therefore a strong argument for allocating more land for the Prime Four Extension now to allow for the continued growth and success of the site in order to capture this current demand.

Concern over traffic impact and suggestions about roads changes are noted, however this will be assessed as part of the Masterplan and planning application process. The Aberdeen Masterplanning Process - A Guide for Developers (CD46) explains what is expected from Masterplans and Development Frameworks including, in Section 3, their content. This should include a site description, including

the surrounding area on issues such as open spaces, the landscape, greenspace network and so on and the context, identity and connections between them. In the 'Other Factors' section of Proposed Plan Appendix 2 (page 82) for the site it states, "Masterplan required. A TIA (Traffic Impact Assessment) will be required. In addition, adequate buffer zones for the Quaker Burial Ground and the woodland will need to be identified in the masterplan." In doing so there may be opportunities to secure better management of the woodland and Burial Ground as both appear to be somewhat neglected at the moment.

It is accepted that OP63 will be visible from the road network. However, the overall character of the immediate area is likely to change substantially with the construction of the Aberdeen Western Peripheral Route (AWPR). The western boundary of OP63 has been drawn to coincide with the boundary of land required for the construction of the AWPR. OP63 will therefore sit alongside the road and will not be seen as isolated or unduly prominent.

In terms of comments on density, it is always possible to increase this. However, this has to be balanced against the character of the site and the nature of the uses there. Prime Four is regarded as a high quality employment site that has been masterplanned from the start. Whilst some of the plot sizes are large, so are some of the buildings and it is considered that the uses and densities present are appropriate.

Development at Kingswells and Greenferns

152, 183: The Aberdeen City and Shire Strategic Development Plan 2014 (CD12) sets the requirements for greenfield housing/employment allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed LDP. The suggested reasons for the release of additional land including the delay in delivery of sites, the number of large sites being too high and the overall target being unambitious were dealt with in the examination of the Strategic Development Plan (CD13) and it was found that there was no requirement to allocate additional land. The modifications suggested above by respondents 152 and 183 are dealt with in Issue 8 Alternative Sites in Kingswells and Greenferns.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	ALTERNATIVE SITES: KINGSWELLS & GREENFERNS	8
Development plan reference:	No reference in the Plan	

Body or person(s) submitting a representation raising the issue (reference no.):

Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of Carlton Rock Limited (75)
Mr Alasdair Morrison of GVA James Barr on behalf of Leto Limited (89)
Mr Ian Livingstone of Ryden LLP on behalf of Stewart Milne Homes (117)
Mr Christopher Ross of Barratt North Scotland (125)
Mr Roger Laird of Archial Norr on behalf of Mr S. Barrack (141)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Mr Scott Leitch of Halliday Fraser Munro on behalf of ANM Group (155)
Ms Meabhann Crowe of Colliers on behalf of AA Webster and Sons (162)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Alternative sites in Kingswells and Greenferns

Summary of the representation(s):

Hayfield Riding Centre and Fields to the East of Hazledene Road

75: Two sites - subject to planning application 141026 for the construction of a hotel with swimming pool, spa, restaurants, banqueting/ conference facilities (Site A) and for the redevelopment of the Hayfield Riding School to form an equestrian centre (Site B) have been referred to the Scottish Ministers after Full Council gave a willingness to approve pending the securing of developer contributions, towards upgrading of access roads and paths, recreational and wildlife enhancements to Hazlehead Park, public bus services and the Strategic Transport Fund.

Former Dobbies Garden Centre

75: Former Dobbie Garden Centre should be removed from the Green Belt and Green Space Network and identified as an Opportunity Site for development. The Plan fails to meet the housing allowances in the Strategic Development Plan. The shortfall is likely to be exacerbated by delays in bringing forward large scale releases, such as the Council owned land at Greenfems which has failed to come forward for development despite having been allocated since 2008. The Council require to consider other smaller sites which can help to maintain a five year land supply.

Site East of Lidl, Lang Stracht

89: Allocate the site to the east of the existing Lidl store on the Lang Stracht as 'Retail'. There has been a long identified need for additional floorspace in the west of

Aberdeen that is confirmed in the Aberdeen City Council Retail Study. There is an opportunity for linked trips with the existing Lidl store and this additional retail space would address the needs of a growing residential population. The site is immediately adjacent to a previous detailed planning permission for a supermarket demonstrating that there is no traffic concern. There are no sites available for this type/scale of retail at either Rousay Drive District Centre or Lang Stracht or Mastrick Local Centres. There is good road and public transport access and it is well located in terms of proposed new residential areas.

Derbeth, Gillahill & Huxsterstone (Kingswells Expansion) (B0303)

117: Object to the non-allocation of Derbeth (part of Development Option B0303) for the allocation of a mixed use development comprising 900 homes and 6.5 hectares of employment land. The AWPR upon completion will effectively become the defining boundary to the settlement, which is situated in the Green Belt. The land at Derbeth will become infill, maximising land resource whilst enhancing the character and setting of the area. With the high volume of employment allocation there needs to be further residential allocation to create a balanced and sustainable community. The site is effective and can be delivered quickly. It is served by good public transport.

162: The land at Derbeth Farm lies to the immediate northwest of Kingswells. It represents a logical and suitable location for development to take place with the ability to provide a mixed use development, new local centre and potentially educational facilities adjacent and connected to the existing Kingswells settlement. It is currently designated Green Belt and (partially) Green Space Network. The Plan has placed significant focus on greenfield land release and it is acknowledged that in many areas this is a necessity to meet LDP requirements. However, the Local Authority have a duty to release land in locations which are confirmed as viable and are or can become effective in the Plan period to deliver development. The Proposed Plan Green Belt boundary around the settlement of Kingswells is inappropriate and fails to acknowledge the terms of SPP. The boundary should be moved westwards to align with the visual and physical boundary of the AWPR. This would allow for development to take place at Derbeth Farm. This site is deemed suitable in terms of location for medium/long term development, which would represent a logical and viable expansion to the urban form in this area. It has been noted that the Council have not suggested to include a draw-down mechanism to meet any shortfall which may occur in Phase 1 or 2 of the land release schedule. It is therefore urged that the Council should review its position in respect of Derbeth Farm.

117: Object to the non-allocation of Gillahill (part of Development Option B0303) for the allocation of a mixed use development comprising 600 homes and a new primary school. Development at Gillahill would maximise land resources and enhance the character and setting of the area. Site relates well to and fits with the wider settlement, avoiding coalescence. With the growth of employment land at Kingswells there needs to be further housing allocations to create a sustainable and balanced community. The road network due to upgrades associated with the delivery of Prime Four, would be able to accommodate traffic generated from the proposed residential development. There are good walking, cycling and public transport links.

117: Object to the non-allocation of Huxterstone (part of Development Option B0303) for the allocation of a mixed use development comprising 90 dwellings. The site relates well to existing development, nearby services, employment land at Prime Four and the public transport network, which enhances the site's connectivity. The principle of residential development has been accepted upon the land at Huxterstone owing to the area being recognised in the Finalised Aberdeen Local Plan 2004 as a Future New Community. The site is unconstrained and developable in the short term. It will maximise land resource and enhance the appearance and setting of the area. Housing will be required to balance the employment allocations at Kingswells. The site will maximise land resource whilst preserving the setting of Kingswells as well as implementing a defining eastern edge to the settlement.

Huxsterstone Healthcare Facility (B0947)

155: The land at Huxsterstone (B0947) should be removed from the Green Belt/Green Space Network and allocated as an Opportunity Site suitable for the creation of a Healthcare Village for healthcare and related uses. The site lies within an area where major developments are being delivered, including Countesswells, Prime Four Business Park and the AWPR. There is only one private hospital in Aberdeen at present and there is a need for such a facility.

Land at Newton East, Old Skene Road (B0306)

125: Object to the non-inclusion of site B0306 as a residential development for 20 units within Phase 1 of the Plan. The site is located to the south of Old Skene Road. Development will not create an unacceptable impact on the surrounding landscape, there are well defined clearly identifiable visual and robust boundaries.

Land at Kingswells East (B0305)

152: The land at Kingswells East should be allocated for residential development in order to bring forward land in an appropriate location capable of delivering effective housing land in the first period of the Plan. The site is located to the east of Kingswells and to the north of Old Lang Stracht. The land is capable of delivering approximately 80 houses together with new public open space provision.

Brownfield Site at Skene Road, Maidencraig (B0301)

141: Request that the brownfield site at Skene Road in the Maidencraig area is included as an Opportunity Site in the Local Development Plan. It is 0.7 hectares and can accommodate 15 dwellings with open space. A pedestrian link would be provided to the nature reserve. It lies outwith the flood area. The Local Nature Reserve would be untouched by the development and measures would be taken to ensure the protection of bats. The approval of the Maidencraig Masterplan to the north shows the acceptability of development in close proximity to the LNR. SPP and SDP advocate that brownfield land is the preferred location for development. There is potentially a large shortfall in the supply of sites on brownfield land and the site at Maidencraig represents a suitable site for allocation.

Maidencraig (B0311)

183: Object to the non-allocation of site B0311 Maidencraig for either residential (200 units) or employment development. Due to the constrained housing developments in the area, an additional 350 houses are required to be allocated in the period 2017-2026 to meet SDP requirements. Additional land is also required to meet employment allocations as these mostly tied to constrained housing sites. The house site would be deliverable in the 2017-2026 period, and would be an extension of the existed masterplanned area. The development could be accommodated within the landscape up to the 145 metre contour line without risk of significant visual impact or risk of coalescence with Kingswells. Once new facilities are built in the Masterplan Zone these will be in close proximity. Either a residential, business or mixed use development on the proposed site is therefore proposed as suitable for addressing the shortfall identified in the delivery of sites allocated in the Local Development Plan 2012.

Modifications sought by those submitting representations:

Hayfield Riding Centre and Fields to the East of Hazledene Road

75: Identify both sites as Opportunity Sites in Appendix 2 and in the Proposals Map, referring to the Council's willingness to approve application reference P141026.

Former Dobbies Garden Centre

75: Remove the former Dobbies Garden Centre from the Green Belt and Green Space Network and identify it as an Opportunity Site for development. It should be included in Appendices 1 and 2 of the Plan as a brownfield site.

Derbeth, Gillahill & Huxsterstone (Kingswells Expansion) (B0303)

117: Remove land at Derbeth from the Green Belt and Green Space Network. Allocate the site for mixed use development for 900 homes. Table 5 should be modified accordingly.

162: Remove the Green Belt/Green Space Network status and allocate the site for longer term residential development.

117: Remove land at Gillahill from the Green Belt and Green Space Network. Allocate the site for mixed use development for 600 homes and a primary school. Table 5 should be modified accordingly.

117: Remove Green Belt status from the remaining land at Huxsterstone

Huxsterstone Healthcare Facility (B0947)

155: Remove Green Belt status from Huxsterstone and allocate as an Opportunity

Site suitable for the creation of a Healthcare Village.

Land at Newton East, Old Skene Road (B0306)

125: Remove site from the Green Belt and allocate as LR1. Modify Table 5 and Appendix 2 as required.

Land at Kingswells East (B0305)

152: Allocate land at Kingswells East for residential development in the Local Development Plan.

Brownfield Site at Skene Road, Maidencraig (B0301)

141: Allocate additional land at Maidencraig through the inclusion of the Skene Road brownfield site.

Maidencraig (B0311)

183: Remove the site from the Green Belt and allocate it as an Opportunity Site.

Summary of response (including reasons) by planning authority:

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

Hayfield Riding Centre and Fields to the East of Hazledene Road

75: We do not propose to remove the Green Belt designation for these sites at this time. Both of the sites referred to by the respondent were received by Aberdeen City Council as proposals at the Proposed Plan stage of the Local Development Plan process. The sites were not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in

2014. As such, the only occasion the Council has had to formally consider these sites in terms of their suitability for inclusion in the Local Development Plan has been at Proposed Plan stage in response to this representation. It is recognised that on 13 May 2015 Aberdeen City Council stated a willingness to approve planning permission for a country house hotel circa 200 bedrooms, spa, swimming pool, function and conference facilities, restaurants and equestrian centre on the Hayfield site, associated car parking and alterations to access roads (P141026), subject to conditions and the negotiation of a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended (CD02).This Section 75 agreement has not yet been finalised.

If the Council were to identify these sites as Opportunity Sites at this point in Plan preparation then this would be a Notifiable Modification to the Proposed Plan which would cause significant delays to the adoption process. Paragraph 87 of the Circular 06/2013 – Development Planning (CD10) makes it clear that delays to the adoption of a Plan should be avoided, "Scottish Ministers expect an authority's priority to be to progress to adoption as quickly as possible. Pre-Examination negotiations and notifiable modifications can cause significant delay and so should not be undertaken as a matter of course". Site assessments have been carried out (CD31) which found both sites to be desirable for the uses for which there is a willingness to approve planning permission. Given that both sites have a willingness to approve (pending the securing of developer contributions P141026) it is not deemed necessary to identify them as OP sites in the Proposed Plan at this time. We would however expect the next iteration of the Local Development Plan to reflect this planning permission, assuming that a consent will have been issued by this point.

Former Dobbies Garden Centre

75: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31) There are issues accessing the site, Hazledene Road is very narrow and there are several corners that have to be negotiated slowly due to blind spots. Development on this site would erode the rural setting and have a negative impact on the landscape of the area. Development would be unrelated to existing settlement and public transport links making the development potentially heavily car reliant. The site is surrounded by the Denwood - Hazlehead Local Nature Conservation Site (LNCS) (CD40) which contains a good network of paths and is well used by local people. The LNCS supports a number of breeding birds and mammals including Red Squirrel and Wych Elm. This site is not considered to be suitable for development and should remain as Green Belt.

Site East of Lidl, Lang Stracht

89: We do not propose to alter the zoning of this site. Aberdeen City Council has assessed this site, considered it undesirable for the use proposed, and considered the proposal to be undesirable (CD31).This site was not put forward at the Pre-Main Issues Report Call For Sites stage in 2013, or submitted as a representation to the Main Issues Report in 2014. It has therefore only been proposed as a representation to the Proposed Plan. The site is currently zoned under Proposed Plan Policy B1

Business and Industrial Land and rezoning to allow for retail development would result in the loss of this Business and Industrial Land. The site is currently occupied by a functioning car garage/workshop. The Aberdeen City and Aberdeenshire Retail Study 2013 (CD16) identifies retail deficiencies across the region. One of these deficiencies lies within Zone 29 West Aberdeen. The Retail Study (page 29) states that new convenience floorspace is required in Zone 29 and states that no specific location has been identified for this zone. It is however expected that the Countesswells development (Proposed Plan Opportunity Site 38) will meet some of the qualitative deficiencies for this area. The site East of the Lang Stracht lies on the border between Zone 29 West and Zone 28, as set out in Figure 4.3 of the Retail Study (page 38). Given the resultant loss of Business and Industrial land, Aberdeen City Council are of the opinion that the current zoning should remain. It is not considered that the findings of the Retail Study provide a sufficient reason for the zoning of this site to be altered.

Derbeth, Gillahill & Huxsterstone (Kingswells Expansion) (B0303)

117, 162, 155: We do not propose to allocate these three sites ((Derbeth, Gillahill & Huxsterstone) for development. These sites were previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 35). The Reporter concluded that the Green Belt status of these sites was justified by reasons of protecting the setting of Kingswells and preventing encroachment into the countryside that separates Kingswells from Aberdeen.

Aberdeen City Council has reassessed this site, again considered them undesirable, and rejected them on the grounds set out in the Proposed Plan Site Assessment Report (CD31).In addition to the Green Belt status, there is no primary school capacity at Kingswells Primary School (CD32). There are also problems in terms of successfully integrating these sites with the existing Kingswells community, particularly pedestrian links and strong links to the Three Hills Local Nature Conservation Site(LNCS). We remain of the opinion that the Derbeth, Gillahill and Huxsterstone sites should remain as Green Belt.

Huxsterstone Healthcare Facility (B0947)

155. We do not propose to allocate this site for development. The site was previously assessed at Pre-Main Issues Report stage in 2013 (CD28) for retail/commercial and was considered to be undesirable for development. The site is now proposed for a Healthcare facility and the Council have reassessed this site on this basis. The Council still consider the site undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).

The site is located close to the proposed Aberdeen Western Peripheral Route's South Kingswells Junction, and it is acknowledged that healthcare in this location would be easily accessed. However, the land in question lies south of the A944 and this busy road helps to form a very well defined and robust Green Belt boundary, as is highlighted in the Green Belt Review (CD38). Allowing development in this area would weaken this boundary and could lead to coalescence with the proposed Countesswells development. It is for these reasons that this land should remain as

Green Belt.

Land at Newton East, Old Skene Road (B0306)

125: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Although the site is small, the site contributes to maintaining the open setting between Kingswells and Aberdeen. Development on this site would have a negative impact on landscape and views and Kingswells Primary School is at capacity so any additional pupils generated by this development would compound this situation (CD32). We are of the opinion that this site should remain as Green Belt.

Land at Kingswells East (B0305)

152: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site sits just below Newpark Hill and occupies a significant position within the landscape. It is visible from Old Kingswells, many parts of new Kingswells, and the surrounding area to the south, east and west. The site is especially visible from the A944. Its development would encroach into the open countryside which separates Kingswells from Aberdeen. We are of the opinion that this site should remain as Green Belt.

Brownfield Site at Skene Road, Maidencraig (B0301)

141: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).It is acknowledged that this proposal would include an area of land that has previously been developed and the development would be closely linked to the new community identified in the existing Local Development Plan at Maidencraig. However, the Den of Maidencraig (LNCS) (CD40) is an important feature that runs along the boundary of this site with the Maidencraig site. Any development in this area may increase the risk of flooding and increase the area of land at risk from flooding. Taking into account the potential impact on the Den of Maidencraig it is considered that there is no over-riding benefits arising from this site which would justify allocating it for development.

Maidencraig (B0311)

183: We do not propose to allocate this site for development. Aberdeen City Council have assessed this site, considered it undesirable and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). This site was submitted for consideration during the process of preparing the extant Local Development Plan 2012 and it was determined through the Aberdeen Green Belt Review (CD38) that the existing track from the Lang Stracht to Fernhill cottage provides a robust boundary for the allocated Maidencraig development. This site is part of an area of open countryside which serves to prevent the coalescence of Kingswells and Aberdeen and helps to maintain their unique identities. Given that we have already concluded that we do not consider it necessary to allocate any further greenfield

sites beyond those already identified in the Proposed Plan, we are of the opinion that this site should remain as Green Belt.
Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	ALLOCATED SITES & GENERAL AREA STRATEGY: COUNTESSWELLS	9
Development plan reference:	Pages 13-14 and Page 83. Proposals Map, Table 6, Table 6 notes, Masterplan Zones Table, Appendix 2	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Ken Hutcheson (9)
Mr & Mrs George and Maureen Findlay (22)
Mr & Mrs Mark & Karen Souter (27)
Mr Alexander Hamilton (36)
Mrs Jane Hamilton (37)
Mrs Dorothy Semple (43)
Mrs E. W Boyd (49)
Mrs Eve Glegg (50)
Mrs Joan Robertson (61)
Mr Sandy Hutchison (113)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Mrs P.M. Fullerton (168)
Mr Michael Lorimer of Ryden LLP on behalf of Stewart Milne Homes (173)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Overview of Direction for Growth in this area and specific OP sites

Summary of the representation(s):

Area Spatial Strategy

152, 183: There is over-reliance on a single, large scale development to provide the required housing land supply in this area. There are concerns about the delivery.

43, 50: There is significant development in this and surrounding areas. The cumulative impact of development needs to be addressed.

173: Object to the allocation of 10 hectares of employment land. The focus should be on smaller scale business spaces, with flexible uses. This would promote a higher density, town centre approach.

168: The building of large number of houses will not help the housing shortage, and

there is an insufficient mix of housing. There is not the population to fill these houses.

Transportation

9, 22, 27, 36, 37, 43, 49, 50, 113, 168: Concerns about road infrastructure capacity.

43: The Bridge of Dee is at capacity at present.

22, 27: New road required prior to development.

22, 27: Emergency vehicles are struggling to access the roads in this area at present.

27: Building on site should be postponed until the completion and opening of the Aberdeen Western Peripheral Route.

136: Ensure there are sustainable means of travel, allowing and giving people the opportunity to travel to work on foot.

Infrastructure and Services

27, 168: The schools at Kingswells and Cults are at capacity.

168: There are a lack of services in the area.

173: Support retail provision in the development but are disappointed the Proposed Plan has not stipulated where this will be. A mid-range supermarket will anchor retail provision. 7,000 metres squared should be allocated to Countesswells. A 2016 start date at Countesswells will provide an established population by 2025 coinciding with the Retail Strategy timescale for retail provision within Zone 29N.

Scale of Development

36: Concern about the size and scope of the development.

Environmental Concerns

113, 168: The development will have a negative environmental impact.

50, 61: The Green Belt, Hazelhead Woods and Hazelhead Park are needed and should be protected.

61: Wildlife is dependent on these areas.

Financial Impact

113: Financial risk due to the downturn in oil at present.

Detail of the Development

136: The site needs to be mixed in terms of uses and residential property size.

Modifications sought by those submitting representations:

Area Spatial Strategy

43: Remove Countesswells. Build on brownfield land, possibly the old Hall Russell Yard.

152: Allocate Foggieton for 650 houses and other Mixed Use developments.

183: Allocate additional housing sites.

173: Reduce the employment land allowance.

Transportation

22, 27, 50: Build a new road before construction begins.

36, 37, 49, 168: Scale back development until the appropriate infrastructure is in place.

Infrastructure and Services

173: Allocate the full 7,000 metres squared retail provision identified for Zone 29 West in Countesswells.

Environmental Concerns

61: Retain the green areas.

Financial Impact

113: The site should be on hold until the economy has stabilised.

Summary of response (including reasons) by planning authority:

Area Spatial Strategy General and Scope of Development

36, 43, 50, 152, 168, 173, 183: The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination (Issue 5 pages 54 - 74) (CD13). The Reporter's conclusion stated "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agrees with these conclusions.

The Vision and Objectives for the Proposed Plan are the same as the Aberdeen City and Shire Strategic Development Plan 2014. The role of the Strategic Development Plan is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 06/2013 paragraph 41, CD10). The Strategic Development Plan sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans.

Large, strategic-scale housing sites form an important part of the Proposed Plan's ambition to create sustainable, mixed communities. This allocation has been carried forward from the Aberdeen Local Development Plan 2012 (CD42). The principle of Countesswells allocation was tested during the Examination of the 2012 Aberdeen Local Development Plan (CD44, Issue 33). It remains appropriate to identify the site as a development opportunity for 3,000 houses and 10 hectares of employment land as there has been no significant change in circumstances which would justify an amendment to this designation.

The site is subject to an approved Development Framework and Phase 1 Masterplan which was adopted as Supplementary Guidance to the extant Local Development Plan in July 2014. The intention is for these documents to be re-adopted with the Proposed Plan upon its adoption. Planning Permission in Principle (140438) was approved by Full Council on 19 August 2015 (RD62). It was previously deferred to the Full Council meeting on 8 October 2014 (RD63), where Members were minded to approve the application subject to a legal agreement signed under Section 75 of the Town and Country Planning (Scotland) Act 1997 ('Section 75 agreement') relating to a number of matters. The Section 75 agreement has still to be signed and registered and a large number of parties are involved. Two further Planning Permission in Principle applications (141888 and 141889) have been lodged for

alternative access arrangements, and a number of Detail Planning Applications (140730, 141110 and 141665) have been lodged. The principle and scale of the development has been well established and is deemed acceptable. No detail was provided on the Old Hall Russell Yard; therefore no assessment could be carried out to determine if the site was suitable.

Transportation

9, 22, 27, 36, 37, 43, 49, 50, 113, 136, 168: A development of 3,000 dwelling houses, 10 hectares of employment land and associated services and facilities is going to necessitate a need for significant transport improvements. The Countesswells site, once complete will be a new community and the existing road network is clearly not currently suitable to deal with additional traffic. The Masterplan for the site has identified transport and road upgrades, as does the Proposed Action Programme (CD21). The Aberdeen Western Peripheral Route is now being built, which will take traffic away from unsuitable roads heading north and south of the city. It is the Council's contention that this infrastructure is necessary to support this development.

Transport Assessment and infrastructure thresholds have been submitted with the current pending planning applications, and have been assessed by the Council's Roads Projects Team and Transport Scotland; these have been deemed acceptable. A Condition shall be applied to the Planning Permission in Principle 140438 limiting development to Phase 1 (comprising 1,000 residential units; 1,000 square metres Ground Floor Area Class 4 office space; 2,500 square metres Ground Floor Area Class 1 retail space; and associated ancillary uses) for the period prior to the Aberdeen Western Peripheral Route being open to traffic, and the consequent removal of Trunk Road status for the A90 Anderson Drive. Planning Permission in Principle Application 141889 requires the Kingswells roundabout to be upgraded by 401 units, and Planning Permission in Principle 141888 requires the Jessiefield Link by the 1001st unit.

Infrastructure and Services

27, 168, 173: The required infrastructure for this area is identified in the Proposed Action Programme (CD21), the Infrastructure and Developer Contributions Manual SG (CD25), the Development Framework and Phase 1 Masterplan and the Planning Permission in Principle application 140438. The Planning Permission in Principle application identified that the development would provide one secondary school, and two primary schools, with one being a two stream, with the other capable of being a three stream if deemed necessary. The Development Framework and Phase 1 Masterplan, and Planning Permission in Principle application (140438) outlines two neighbourhood centres to accommodate shops and community facilities thereby providing services for the local community. The Planning Permission in Principle application outlines a further application would be required to be submitted on the

detail of this. A UK Treasury guarantee for a £80 million loan to help finance infrastructure for the development was announced by the Chief Secretary to the Treasury on 15 August 2014 (RD64).

The Development Framework and Phase 1 Masterplan outlines a supermarket to meet the needs of the local community. The Aberdeen City and Aberdeenshire Retail Study 2013(CD16) states a requirement for 5,500 square metres (gross floor area) for the west of Aberdeen/Countesswells for a supermarket/superstore/other convenience. This does not all have to be provided in one location. It also specifically recommends for Countesswells a maximum 1,500 square metres (gross floor area) of general comparison floorspace - see Table 7 in the Executive Summary and Part 6 of the main report – Recommended Retail Strategy. Any retail proposals for Countesswells should align with these recommendations as outlined in paragraph 3.28 of the Proposed Plan and would need to be considered against the Plan's retail policies.

Environmental Concerns

50, 61, 113, 168: The site was removed from the Green Belt with the adoption of the extant Local Development Plan 2012. Boundaries have been drawn as such to reduce impact on adjacent woodland areas, and Green Space Network is used to maintain a wildlife corridor through the site. Within the area identified there are no local, national or international natural heritage designations.

The impact of the development on Hazelhead Park is likely to be limited to an increase in recreational use. Providing doorstep opportunities for people to gain easy access to open space, woodland and parks is considered beneficial to the health and wellbeing of the population. As proposed in the Development Framework and Phase 1 Masterplan and the Planning Permission in Principle (140438), a proposed access road post 300 units will be formed from the Switchback (Jessiefield) and will cut through Hazelhead Woods. The woods will be furthered enhanced as an area of urban space through a core path linking Hazelhead Woods and Countesswells Woods.

Financial Impact

113: The development would assist with meeting the housing and employment land need identified in the City, and complies with the Aberdeen City and Aberdeenshire Strategic Development Plan. The Plan is a long term vision for the city. It needs to be ensured that the opportunity is there to provide sufficient homes, places of employment and leisure activities to support this demand.

Detail of the development

136: The development would be mixed use, as its allocation includes both housing and employment uses. Both the Development Framework and Phase 1 Masterplan,

and the Planning Permission in Principle application (140438) outline the development would be mixed use with neighbourhood centres. The development would need to comply with housing mix and affordable housing policies, and again both the Development Framework and Phase 1 Masterplan, and the Planning Permission in Principle application outlined this to be the case.
Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	ALTERNATIVE SITES: COUNTESSWELLS	10
Development plan reference:	No reference in the Plan	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Tim Reid of Urban Wilderness Ltd on behalf of The Reid Family (138)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Mr Michael Lorimer of Ryden LLP on behalf of Stewart Milne Homes (173)

Provision of the Development Plan to which the issue relates:	Alternative sites in Countesswells

Summary of the representation(s):

Thornhill (B0944)

138: Object to the non-allocation of site B0944 for residential development. The site provides easy access to Aberdeen, would provide local leisure and recreation facilities and 25% of the housing would be affordable.

Foggieton (B0921)

152: Object to the non-allocation of site B0921 for 650 houses, a neighbourhood centre, public open space and woodland walks. The site would be closely aligned in location and principle of development of Countesswells and development would be guided through the masterplanning process

Countesswells Expansion (B0918)

173: Object to the non-allocation of site B0918. The development comprise six pockets of land, and would allocated 1,500 homes, with 1,000 homes in Phase 1 and 500 in Phase 2. New infrastructure will be delivered, as is outlined in the Countesswells Development Framework and Phase 1 Masterplan and the Planning Permission in Principle for Countesswells, and it is logical to build development off this road. Development would respect landscape.

Modifications sought by those submitting representations:

Thornhill (B0944)

138: Allocate Thornhill for future residential development

Foggieton (B0921)

152: Allocate Foggieton as a residential led mixed use development

Countesswells Expansion (B0918)

173: Expand the boundaries of OP38 to include these parcels of land as a suitable location for development to be delivered post 2023.

Summary of response (including reasons) by planning authority:

General Strategy

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

Thornhill (B0944)

138: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected by the Reporter (CD44, Issue 11). Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site would constitute a substantial but isolated development in the Green Belt, undermining the existing separation between Cults and Aberdeen. The site is remote in transport terms and there is insufficient capacity to accommodate school pupils within the current schools (RD75).

Foggieton (B0921)

152: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site forms part of the

Foggieton Local Nature Conservation Site (CD40, also see Proposed Plan Additional City Wide Proposals Map CD23) and development would result in the loss and/or disturbance of designated species and priority habitats. The site is also highly visible in the surrounding landscape and would have a negative impact on the character of the surrounding area.

Countesswells Expansion (B0918)

173: We do not propose to allocate these sites for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).

The six areas for expansion abut the existing allocated site, Countesswells (extant Local Development Plan OP Site 58, Proposed Plan OP Site 38). The site boundary of the Countesswells Site was subject to Examination as Issue 33 during the Examination into the extant Local Development Plan 2012 (CD44, Issue 33). Three of the proposed areas of expansion proposed by this representation have been subject to Examination previously, these are areas identified as '1', '4' and '5' in the Proposed Plan 2010 consultation response.

As part of the submission to the Pre-Main Issues Report consultation in 2009, bid 9/24: Countesswells covered an area larger than the eventual allocated site for Countesswells (RD53). The non-allocation of the larger site was subject to representation during the previous proposed plan consultation (RD54 & RD55).

The 2009 9/24: Countesswells submission included the land which is identified as '1' and '3' in this current representation to the Proposed Plan. The land identified as '3' in the submission to this Proposed Plan was not subject to a representation in the Examination into the extant Local Development Plan 2012, yet was nevertheless subject to Examination as the boundary of the Countesswells site was examined.

The areas identified as '4' and '5' in the representation to this Proposed Plan were also a subject of the Examination into the extant Plan. Area '4' and '5' were submitted in 2009 as Bid 9/50: Land to the West of Loanhead Road (RD56), and were subject to representation during the previous proposal plan consultation (RD57 & RD58).

The Reporter's Report following the Examination of the extant Local Development Plan 2012 Examination (CD44, Issues 33), in response to the representations on the site boundary, acknowledged that a review of the Green Belt was used by the Council to help identify the most appropriate boundary.

The Reporter's finding into Issue 33, point 9 further outlined, "I recognise that there could also be scope for extending the development area at Countesswells to incorporate suggested areas of land to the south-west and to the north-east. However, I agree that the boundaries defined by the Council are the most appropriate and that the area identified is likely to be sufficient to accommodate the scale of the development which is proposed, and at the densities of development envisaged. On this basis, I consider that no modifications to the site boundary shown on the proposals map are justified". The Proposed Plan currently subject to

Examination again seeks to make the most efficient use of land, and paragraph 3.76 states that a net density of 30 dwellings per hectare should be achieved, in line with sustainable mixed communities targets on page 37 of the SDP. It is submitted by the Council that by making the most efficient use of land there would not be a requirement to increase site boundaries for the Countesswells site. Basing the calculation on 20 dwellings per hectare to take account of landscaping, strategic road infrastructure and large areas of open space, there is sufficient land to provide 3,000 dwelling houses.

The placement of the access road within the Development Framework and Phase 1 Masterplan which is currently adopted as Supplementary Guidance to the extant Local Development Plan 2012, and the Planning Permission in Principle afforded to the development of the site (140438) do not automatically mean the land surrounding the access road would be developable land.

Further, this proposed expansion would lead to loss of woodland and disturbance to designated species and their habitats. Development on these sites would be visually intrusive and would have a detrimental impact on the surrounding landscape. The Countesswells allocation is anticipated to build out at a rate of about 200-250 units per year and is not expected to be complete until post 2020 (RD65). Adding additional land to the OP58 allocation is not likely to increase housebuilding on this site in the next plan period.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	ALLOCATED SITES & GENERAL AREA STRATEGY: DEESIDE	11
Development plan reference:	Pages 14- 15 and Pages 83-86, Proposals Map, Table 7, Table 7 notes, Appendix 2, Appendix 5, Appendix 6	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Graham Devereux (1)
Mr John Eagles (4)
Mrs Gillian Devereux (5)
Mrs Alison Olsen (7)
Mr Ken Hutcheson (9)
Alan Wilson (11)
Justin Austin of amec foster wheeler E &I UK on behalf of National Grid (12)
Mr & Mrs G Knox and Mr R Knox (13)
Erika Olsen (16)
Miss Lisa Burnett (23)
Mrs Sandra Cawthorne (39)
Mrs Janet Hosie (44)
Mr Ian Porter (46)
Dr H R Millar (47)
Mr & Mrs Thain (51)
Ms Nina Turner of Scottish Natural Heritage (54)
Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of Leiths (Scotland) Limited (65)
Mrs Theresa Hunt of Burness Paull LLP on behalf of Mr George Souter (80)
Mr Albert Middler (83)
Ms Lavina C. Massie on behalf of Culter Community Council (98)
Mrs Juliet Macleod (99)
Mr Peter Roberts of Cults, Bieldside & Milltimber Community Council (102)
Mr & Mrs A Porter (107)
Mr Allan B. Chalmers (110)
Mrs Brigitte Matthews (114)
Ms Lynda Kelman (119)
Mr Ian Cowe of Forestry Commission Scotland (126)
Mr Kenny Clubb of Churchill Homes on behalf of Churchill Homes (151)
Mr Roy McLennan (171)
Mr Terence Fullerton (172)
Mr A. Lewis (174)
Mrs Sheila Waler (175)
Mrs Susan Lewis (178)
Mr Ben Freeman of Bancon Developments (183)
Mr Mark Kaczmarek (185)

Provision of the Development Plan to which the issue relates:	Overview of Direction for Growth in this area and specific OP sites

Summary of the representation(s):

Deeside - General

98: Developers should build affordable homes instead of giving contributions as planning gain. Culter Community Council need homes to keep the community viable and prevent it from becoming a dormitory suburb.

98: Culter Community Council are in agreement with most of the policies and have used them to evidence the Spatial Strategy comments. They highlighted how they could deter the erosion of Peterculter as a sustainable community with new family housing. Do not wish to see the community reduced to a dormitory suburb of the city.

183: The Peterculter Burn site is constrained in the Housing Land Audit. Three new sites at Peterculter were dismissed by the Reporter during the Examination into the extant Local Development Plan 2012, only the Oldford site will provide land supply in 2017-2026 phase of the Plan. 160 homes will be complete by 2016, a shortfall of 388. It also shows that 330 will be delivered up to 2026, against an allocation of 248. The remaining shortfall will be built post 2026. Significant failures to deliver housing in other parts of the city justify the increased allocation of housing land in the Deeside corridor.

9: Education - The recent Aberdeen City Council School Estate Consultation in respect of Cults Academy should have taken place prior to the development of new homes at Blairs.

OP43 Milltimber Primary School

Designation

4, 39: Query as to why the site is designated as a brownfield site. The site should be left as open space. The site would be better used by developing it into a play park and sports field.

Trees and Loss of Open Space

39: The site is the only green space for recreation at the lower end of Milltimber. Mature trees around the park should be protected.

Scale of Development and Residential Amenity

4, 39, 44: The development should have regard to all existing properties and the quiet residential nature of the area. Houses on the site should be single storey. Any houses built should be in keeping with the existing properties on Binghill Park and Monearn Gardens, i.e. semi-detached, two storey houses. Very large, expensive detached houses would not be in-keeping. Residents of Binghill Park would have their outlook obliterated which could prove detrimental to house values. Any large

building will completely spoil open aspect from Binghill Park to the south

Flooding

4: Concerns about flooding on the site.

Transport and Access

39, 44: Concern about impact of increased traffic. Access would be from Binghill Crsecent which is already a busy access to roads beyond. Site entrance would be after two sharp bends which are already hazardous. Monearn Gardens is a narrow residential street unsuitable for increased traffic.

OP48: Oldfold

Traffic

13, 98: The allocation will result in a serious amount of extra traffic on North Deeside Road. Visibility splays required to access the site will require works within private property. The main junction of the site with A93 should be the existing junction from Binghill Road with improvement of the Tornadee junction and traffic lights.

Education

98: The new primary school should be located close to Binghill Road, north of Tornadee (central to Milltimber) to help connect the development with the existing settlement and to allow the community to access facilities without having to use North Deeside Road.

Conditional Support for Development

98: Conditional support for the development, subject to the points raised.

Status of Development Framework / Masterplan

98: Query as to whether the Development Framework / Masterplan has been completed.

Identification of Masterplan Zone

102: The Masterplan Zones Figure 1, page 34, omits to mention OP48

Action Programme

102: The Action Plan should include OP48 and as a result the detailed actions should be set out for Oldford.

OP39: Braeside Infant School

11: Object to the loss of this valuable amenity to the area, the school may be required in the future. The development will cause disruption and inconvenience to the surrounding properties, and the development will lead to loss or erosion of the adjacent play area.

OP51: Peterculter Burn

98: Support housing opportunity as it can be developed in the first phase, will support local primary school, encourage and sustain local businesses and sustain the viability and amenity of the community. Developer contributions will include leisure and play area. Affordable homes should be built on site.

183: Object to the allocation of the site.

OP52: Malcolm Road, Peterculter

Previous Examination

5, 46, 5, 107, 183: The site was dismissed at the previous examination and the Reporter's recommendations for the site were that it should remain as Green Belt/Green Space Network due to Malcolm Road being substandard and development not contributing to a compact urban form. Hard to understand why this site is included due to the Reporter's negative comments. It was noted to be remote, isolated and with difficult access.

Natural Environment

5, 23, 51, 83, 107, 110, 114, 126, 174, 1: The area is covered by Ancient Woodland status. SPP states a strong presumption against removing Ancient Woodland. Existing trees would need to be removed and would not meet the requirements of SPP. The site is used by residents for leisure and development would have a significant impact on wildlife. Development would erode the Green Belt and set an unwelcome precedent for development of land with Green Belt status. It will ruin the character and countryside setting of Peterculter and have a significant visual impact on the immediate area. The site forms a natural boundary and development would make the definition between built up are and countryside less clear. There are already sufficient housing allocations in this area and development would intrude into the surrounding landscape. It would provide a precedent which should be discouraged. The site can be viewed clearly from Malcolm Road. Development of this scale would appear sporadic and isolated from Peterculter.

Infrastructure and Facility Constraints

5, 23, 46, 51, 107, 110, 114, 174, 175, 1: The schools and health centres are at capacity. Malcolm Road is a busy commuter route that is unsuitable for the volume and size of vehicles that use it. It would be nonsensical to add further development and junctions. The volume of traffic has increased dramatically due to commercial

office developments in Westhill. Located on the edge of the village it does not have good access, there is no continuous pavement and given the volume of traffic it is not very safe. Pedestrians have to cross at a hazardous crossing point due to poor visibility. This section of road is dangerous and has been the scene of a number of accidents. Developer has not demonstrated how a continuous footpath would be achieved and do not believe contributions will fund upgrades to the footpath and road. Third party ownership prevents the widening of the footpath. AWPR will not result in a decrease of traffic. The site is not on a bus route and access to the nearest stop is by a narrow path. The site is too far from the village resulting in increased use of cars and there is insufficient parking within the village. There is no existing sewerage capacity, the site has steep slopes and there is a lack of employment opportunities and facilities.

Flooding

23, 51, 83, 114: There are ground water/natural drainage issues with flooding after heavy rainfall and development will have an impact.

Mix of Use

114: Residential development will not contribute to a balance of land uses.

Support the Allocation

98, 151: Support housing allocation for the following reasons: They can be delivered in the first phase, will support local schools, encourage and sustain local businesses and help the viability and amenity of the community. The development will comply with the vision by providing affordable housing, leisure and play areas, there will be no vehicle access onto the Core Path, and paved path through the trees will be provided. Affordable homes should be built on the site.

80: Supports the allocation but has the following concerns: the site is in two separate ownerships and the respondent has been working to bring forward their land for high quality houses. The Plan should not prevent this happening at the earliest opportunity and the site should be recognised as the first phase of development. Page 15 requires the site to have a Planning Brief but page 85 refers to a Masterplan. Clarity is required. Council guidance on Masterplans/Planning Briefs are for sites in single ownership. The Respondent's site should be considered on its own as it is not of a scale to require either documents and the requirement to do so will slow down the development unnecessarily. There is no flood risk/drainage issues affecting the respondents site therefore a flood risk assessment is not justified. Tree loss will be kept to a minimum but the Plan must recognise the requirement for their removal.

Property Included

83: Notes that the south-eastern corner of OP52 includes his property and two others on Malcolm Road. Demands an explanation and objects to the proposed

development.

OP108: Mid Anguston

Sustainability

7, 16, 47, 98, 99, 119, 171, 172, 183: Object to the inclusion of the site. Rural community and the access to local employment opportunities and facilities are poor. There is no street lighting or footpaths and would encourage the use of cars. The existing road is in poor condition and does not allow two vehicles to pass. It is used by heavy agricultural vehicles. There will be additional cars which will contradict the Council's Transport Plan and SPP to reduce car usage. The site is 2 kilometres from public transport and 3 kilometres from amenities and shops. If the houses were necessary they could be located on more suitable sites. Community Council members do not enter into discussions with developers. Quarryhill Road would be the entrance/exit for the proposed houses but is not fit for the increase in traffic. There would be a loss of amenity for local residents. Close to Easter Anguston school for disabled and new riding school and increase in traffic would have safety issues for horse riders, vulnerable residents and their carers.

Housing

98, 171: Site does not supply affordable housing. There are sufficient Green Belt allocations. There is an oversupply of housing in the area. There is a history of individual applications for new houses being refused on the basis of Green Belt allocation. Houses will be out of the price range for most people.

Schools

7, 47, 98, 119, 171: Reluctant support given to the site during the preparation of the Local Development Plan 2012 due to concern regarding falling school rolls in Culter Primary School. This has now halted. Cults Academy is forecast to be over capacity. There is no guarantee people with children will buy these houses.

Current Use

47, 119, 171: There is no vermin problem from the chicken sheds as is alleged by the developer. One argument for development is that the chicken sheds are an environmental health issue. It should be the responsibility of the owner to rectify this without the need to build houses.

Water and Drainage

47, 171, 98, 171: There is no mains sewerage. Excavation, given the proximity to Anguston Quarry, would have severe repercussions. The quarry is the water supply for nearby houses and disturbance has potential risk to the water supply. There is concern about water seepage from the disused quarry. There is concern for the potential for pollution reaching the Gormack Burn. Drainage system is over capacity

and there are instances of local flooding.

Environment and Landscape

7, 16, 47, 98, 119, 171: The chicken sheds are less intrusive on the landscape than eight detached houses. New homes will impact on views. The development will alter the nature and settlement pattern and destroy the rural character. There will be negative impacts in the landscape from urbanisation of the greenbelt and goes against greenbelt and landscape policies. It will be an isolated development out of character with the designated greenbelt land. Negative impact on wildlife with development leading to disturbance of wildlife, species and their habitats.

Site Previously Rejected

7, 47, 99, 171, 183: The site was previously rejected at examination and deemed undesirable by officers at Main Issues Report Stage. Other sites were found to be more desirable than Mid Anguston.

Gas Pipelines

12: Site is located within close proximity to gas pipeline. No permanent structures are built over or under pipelines or within the zone specified in the agreements. Local Authorities have a statutory duty to consider applications within the vicinity of pipelines and there is additional guidance that has been prepared by National Grid. If sites are taken forward developers should be made aware of the issues.

Support

151: Support inclusion of OP108 Mid Anguston as a development site.

OP109: Woodend Peterculter

Environment

54, 178, 185, 126: Ancient Woodland is on the site and it is a priority habitat requiring protection. It is part of Green Space Network. Scottish Government guidance includes a strong presumption in favour of protecting woodland. It is difficult to see how 19 houses could be accommodated without impacting on the woodland. Any future proposal will not meet the requirements of SPP or Scottish Government policy and as a result it is not an appropriate site. Concerned about the impact on wildlife. It drains into an existing wetland habitat. Development would fragment the Green Belt and encourage more infill development.

Support

83, 98: Support the proposed development. Dilapidated farm buildings make it necessary for their demolition. The area to the south west of the existing farm buildings is suitable for small development. Support housing opportunity for the following reasons: they can de developed in the first phase; will support local primary

school; will encourage and sustain small businesses into the District Centre; will help sustain the viability and amenity of the community; the development will comply with the Local Development Plan vision by including leisure and play areas; and affordable homes should be built on the site instead of monetary contributions.

Infrastructure

178, 183, 185: The location is unsuitable due to limited infrastructure, schools, GP practice, dental practice etc. Concerned about the increase in traffic that has already been generated by the equestrian centre, on such a small road. Other sites are more suitable and it has been rejected twice. Site is detached from the existing village, remote from services and projects into the Green Belt. The site has no access to transport links. There are no footpaths beyond Bucklerburn Drive, vehicle access is constrained and drainage is an issue.

OP42: Kennerty Mill

98: Support the redevelopment of brownfield site as it has become a local eyesore. Support for the following reasons: they can be developed in the first phase, will support the local primary school, will sustain new and existing businesses, will help sustain the viability and amenity of the community, affordable homes should be built on site instead of monetary contributions.

OP44: North Lasts Quarry

98, 65: Support the greenfield housing allocation for the following reasons: they can be developed in the first phase, will support the local primary school, will sustain new and existing businesses, will help sustain the viability and amenity of the community, affordable homes should be built on site instead of monetary contributions.

Modifications sought by those submitting representations:

Deeside - General

183: Additional housing sites need to be allocated.

OP43: Miltimber Primary School

39: Once Milltimber School is demolished, develop the land and field into a children's playpark and sports field. Save the mature trees that border the field.

OP51: Peterculter Burn

183: Remove the site from the plan.

OP52: Malcolm Road, Peterculter

5, 23, 51, 107, 110, 114, 174, 175, 183, 1: Remove the site from the plan. It is not

viable due to the lack of infrastructure, services and traffic control opportunities. Housing development in Peterculter should be put on hold. Retain the site as part of the Green Belt/Green Space Network.

80: The text should be amended to acknowledge that the site is in two separate ownerships. The Plan should identify the respondent's site as the first phase of OP52. It should be made clear that a Masterplan is not required for the respondent's part of the site nor is a Flood Risk Assessment. The Plan should recognise that there will be trees removed to provide access into the site.

OP108: Mid Anguston

7, 16, 47, 99, 183: Remove OP108 from the Local Development Plan. There are more desirable sites.

OP109: Woodend Peterculter

54: Advise that the boundary of the site is redrawn to exclude the areas of woodland. An alternative approach would be for the requirement of a development brief that would set out how the existing woodland would be protected and managed in the long term.

178, 183: Remove the Opportunity Site from the Plan, there are better sites.

Summary of response (including reasons) by planning authority:

General Strategy

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination (Issue 5 pages 54 - 74) (CD13). The Reporter's conclusion stated "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agrees with these conclusions.

The Vision and Objectives for the Proposed Plan are the same as the Aberdeen City and Shire Strategic Development Plan 2014. The role of the Strategic Development Plan is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 06/2013 paragraph 41, CD10). The Strategic Development Plan sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans.

Deeside – General

98: This point is covered in Issue 28 Affordable Housing.

98: The Proposed Plan aims to deliver sustainable communities in the most sustainable locations. Peterculter is a well-established settlement to the west of Deeside and is a recognised Neighbourhood Centre in the extant Aberdeen Local Development Plan 2012. The Council considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. The Council has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a Neighbourhood Centre.

183: The queries surrounding a shortfall in housing are dealt with in the General Strategy section above.

9: Education - Following the review of the school estate in Aberdeen City in 2012, the Council have been working through an extensive programme of consultations on changes to school zones and other matters relating to the estate. The programme and the timescales for each consultation were required to be approved in advance by Education Scotland. It was not possible to undertake the Cults Academy consultation any sooner, due to the other consultations which were required to be carried out at that time.

OP43 Milltimber Primary School

Background

This allocation has been carried forward from the Aberdeen Local Development Plan (2012) (OP55) and was previously considered by Reporters during the Examination of this Plan (Issue 46 CD44). The site will become available for development once a new Primary School for Milltimber is constructed as part of the OP48 Oldfold site. The site is still currently used for educational purposes.

Designation

4, 39: The site has been previously developed, and thus is considered to be a Brownfield Opportunity Site. This was confirmed by the Reporter via the Examination of the extant Local Development Plan (Issue 46). The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) requires 7,500 homes on brownfield sites up to 2026 and residential development on this site will assist in meeting this requirement. The Reporter in the Examination into the extant Plan confirmed the site's suitability for residential development. The Council's Open Space Audit 2010 Report (CD41) identifies (on page 70) two existing local parks in Milltimber and notes (on page 71) that Milltimber residents are within 400 metre catchment of a local park. As such, there is no specific requirement for an additional local park within

Milltimber.

Trees and Loss of Open Space

39: Although not specifically identified as Urban Green Space on the Proposals Map due to the small scale of the site, the grassed area of the site (school playing fields) is covered by Proposed Policy NE3 - Urban Green Space and will therefore be protected or replaced in accordance with this policy. With regards the protection of mature trees, this issue would be address via the consideration of any planning application for the site, giving due consideration to Proposed Policy NE5 Trees and Woodlands.

Scale of Development and Residential Amenity

4, 44: At the current moment there is no planning application or design brief for the site. Therefore, specific questions regarding the design of the site are unable to be answered at this time. There will be, in due course, more opportunities for the public to comment on this site when a planning application or design brief is lodged. At the moment all comments regarding the layout and design of the proposed development have been noted. Impact on property values and views from private properties are not planning matters.

Flooding

4: A Flood Risk Assessment will be required to accompany any future development proposals and this is mentioned in the Opportunity Schedule in Appendix 2 of the Proposed Plan. Flooding and drainage issues would be addressed and agreed at planning application stage, in consultation with the Council's Flooding Team.

Transport and Access

39, 44: Concerns over traffic impact and access arrangements are noted, however this will be assessed and agreed at planning application process, in consultation with the Council's Roads Project Team.

In summarising the above, the Council continue to recommend that this site is suitable for development, and that its development would help meet the Strategic Development Plan targets for brownfield development.

OP48 Oldfold

Background

This allocation has been carried forward from the Aberdeen Local Development Plan (2012) (OP62) and was previously considered by Reporters during the Examination of this Plan (Issue 40). The allocation is subject to a Development Framework and Masterplan exercise which was approved as Supplementary Guidance to the extant Plan in March 2013. Planning Permission in Principle for the development of approximately 550 residential units, commercial, primary school and associated

ancillary uses and infrastructure improvements including road junction formation on A93 (130378) was approved on 25th February 2015 and a subsequent Approval of Matters Specified by Condition (AMSC) Application for Phase 1 (150260) was approved on 06th August 2015.

Traffic

13: A Transport Assessment was submitted to accompany the Planning Permission in Principle application, and was audited by the Council's Roads Projects Team. The need for a financial contribution towards improvements on North Deeside Road has been secured via a legal agreement signed under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended ('Section 75 agreement').

With regards the visibility splays required for the development, this matter has been addressed during the consideration of the Phase 1 AMSC Application (150260) and the visibility splays approved via this application do not require any works within the respondent's private property.

Education

98: The location of the new Primary School has been approved via the Planning Permission in Principle application approved on 25th February 2015 (130378) further to a detailed Masterplanning exercise. The location of the Primary School is located off Binghill Road, as is the respondent's preference.

Conditional Support for Development

98: Noted.

Status of Development Framework / Masterplan

98: The Development Framework and Masterplan exercise was approved as Supplementary Guidance to the Aberdeen Local Development Plan 2012 in March 2013. We would intend to readopt this document as Supplementary Guidance to the Proposed Plan, following its adoption.

Identification of Masterplan Zone

102: The Oldfold Masterplan Zone has been omitted from Figure 1 as it is considered that development of this site is sufficiently advanced and therefore the site no longer requires to be specifically identified as a Masterplan Zone.

Action Programme

102: A response to this comment is provided via Issue 43 – Action Programme.

In summarising the above, the Council continue to recommend that this site is suitable for development, and that its development would help meet the Strategic

Development Plan targets for greenfield development.

OP39: Braeside Infant School

11: As is outlined in Appendix 2 the school has a potential for future residential use. In the meantime the school can be used to house primary school pupils from the Countesswells development pending the development of a primary school there. Development will have to respect the surrounding residential amenity. The Council seek the retention of the play park in its current location to the south of the site and this is mentioned in the site description in the Opportunity Site Schedule in Appendix 2 of the Proposed Plan.

OP51: Peterculter Burn

98: The support for the opportunity site is noted.

183: The site is already allocated in the adopted Aberdeen Local Development Plan 2012 as an Opportunity Site reserved for residential use (OP134). The principle of its allocation was tested at the previous Examination in Issue 50. It remains appropriate to identify the site as a development opportunity for residential zoning as there has been no significant change in circumstances which would justify an amendment to this designation. Peterculter is a well-established settlement to the west of Deeside with a recognised neighbourhood centre in the Aberdeen Local Development Plan 2012. The Council considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. The Council has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a neighbourhood centre.

OP52: Malcolm Road, Peterculter

<u>Previous Examination</u>

5, 46, 51, 107, 183: Although the site was removed during the Local Development Plan 2012 Examination it has since been reinserted as a preferred option during a Council meeting on 12 November 2013 in regard to the Local Development Plan Main Issues Report. The primary reasons being that it provided further housing opportunities and would help support the local primary school. There is excess capacity with regards to places at the local primary school with a capacity for 87 extra pupils in 2016, as set out in the School Roll Forecasts (CD32). It is recognised that this site lies out with 800 metres from the Neighbourhood Centre of Peterculter. It is, however considered that a residential development here would provide additional support to the community of Peterculter. The Council considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. In order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify additional sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and

as a Neighbourhood Centre.

Natural Environment

5, 23, 51, 83, 107, 110, 114, 126, 174, 1: The site is designated as Ancient Woodland. Any development would be required to mitigate for any loss to established Woodland and comply with Policy NE5 of the Proposed Plan. These issues do not preclude designation as an Opportunity Site and can be dealt at the planning permission stage. The Council considers that this site is a natural extension to the existing community of Peterculter. Despite its elevated position, the existing trees, along with further supplementary planting should provide adequate screening of the site from the surrounding area and will reduce any landscape impacts arising from housing development there.

Infrastructure and Facility Constraints

5, 23, 46, 51, 107, 110, 114, 174, 175, 1: The Council note the level of objection to this site based on the assertion that Malcolm Road is sub-standard and not suitable for the increased traffic that any development would facilitate. Discussions between any developer and the Local Authority Roads Department would be required to address the access issue but it is not considered that there are any technical concerns which prevent access being taken from Malcolm Road to the proposed site. Perceived deficiencies in Malcolm Road itself, for the level of traffic to be generated, can also be addressed at the planning application stage are not deemed to preclude designation for residential use. The construction of the AWPR should also see a reduction in the traffic currently using Malcolm Road to bypass Aberdeen. It is acknowledged that there are capacity issues at Cults Academy with forecasts indicating the school going over capacity in 2021. However, the housing numbers attributed to the Cults Academy catchment include those houses proposed in Countesswells. It is intended that this area will be removed from the Cults Academy catchment thereby relieving some of the pressures on Cults. Representations made reference to the distance to local facilities from the site. It is recognised that this site lies out with 800 metres from the neighbourhood centre of Peterculter. It is, however, considered that a residential development here would provide additional support to the community of Peterculter and to the neighbourhood centre. It is reasonable to expect that residents of this site would make use of Peterculter and its facilities and contribute towards its sustainability. The Proposed Action Programme (CD21) requires that site access from the B979 should be a loop or through road and walking access to both bus services are provided. There is a recognised concern regarding the main sewer at this location, however, again this is not felt to preclude allocation of this site for residential use. It is a matter which can and would be dealt with at the application stage.

Flooding

23, 51, 83, 114: Drainage and run off issues along Malcolm Road are noted. Any development here would be likely to include drainage impact assessments and the implementation of SUDS schemes as appropriate in order to alleviate such issues. The requirement for a Flood Risk Assessment in support of any development proposal is identified in the Proposed Action Programme and in the Opportunity Site

Schedule in Appendix 2 of the Proposed Plan.

Mix of Use

114: The Council has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a Neighbourhood Centre.

Support the Allocation

98, 151: Support is welcomed for the Opportunity Site.

80: As this site is to be developed for more than 50 homes, the developer will be required to prepare a masterplan for the whole site prior to applying for planning permission. The requirement for a masterplan or Planning Brief covering the whole site is important to set out a fundamental framework for the way in which this residential site can best be developed. The masterplanning process will set out the key principles of the design approach but it should be noted that collaboratively masterplanning the sites together does not necessarily mean that they must be delivered together. There are precedents, within Aberdeen City, for sites in multiple ownership which have successfully been masterplanned in a collaborative nature. Masterplanning of this site should take into account Policy NE5 of the Proposed Plan (Trees and Woodlands), which seeks to protect and enhance Aberdeen's trees and woodland. Although the site is in two separate ownerships it is considered overall as one Opportunity Site. Therefore a Flood Risk Assessment will be required to address the whole site including the area owned by the respondent.

Property Included

83: The boundary contains three properties along the southern edge of the site. We are of the opinion that Bucklerburn Road acts as a suitable southern boundary for the site. If these properties were zoned as Green Belt this would not meet the objectives of the Policy NE2: Green Belt. When this site is developed, in the next review of the Local Development Plan, these sites will be zoned as residential which would reflect the proposed use of this site and the current use of the properties.

OP108: Mid Anguston

Supports Local Community and Services in Peterculter

Peterculter is a well-established settlement to the west of the city in Deeside. The Council considers that the continued vitality and viability of Peterculter is an important goal for maintaining Deeside as a whole. The Council recognises that in order to promote and protect local facilities, shops and infrastructure already present within Peterculter it is desirable and necessary to identify additional sites which are acceptable for residential development and have the potential to enhance the viability of Peterculter as a population centre.

Sustainability

7, 16, 47, 98, 99, 119, 171, 172, 183: The Council accepts that the site is outwith the existing settlement at Peterculter. It is also accepted that accessibility to the major road network and public transport facilities is poor. It is anticipated that the majority of residents at the proposed site would use their own vehicles for transport. It is the Council's submission however, that given the relatively small number of units proposed for this site the impact on sustainability will be minimal and therefore acceptable. The Council would wish to note that there is an existing settlement at Mid Anguston, Peterculter and there are adopted roads, street lighting and refuse collections are carried out to the existing dwellings. The school bus has an existing route through Mid Anguston. A safe walking route exists from the site to the local primary school.

Housing

98, 171: The Council's position is that the site would offer eight residential units close to the city for employment opportunities but retaining the character of living within a countryside setting. The housing which is proposed would be in keeping with the local area. The provision of a limited number of larger homes at the site is considered to contribute to a choice for home buyers of a range of properties available both within the Peterculter settlement and within the Aberdeen City boundaries as a whole.

Schools

7, 47, 98, 119, 171: The zoned local Primary School, Culter Primary has excess capacity with capacity for 87 extra pupils in 2016.

Current Use

47, 119, 171: The current condition of the site is considered undesirable and it is the Council's submission that removal of the chicken sheds would be a positive outcome if the site were to be included for residential development.

Amenity

The Council does not consider that the inclusion of the site would cause significant detriment to the amenity of existing residential properties in the locality. Any question of amenity is something which would be dealt with at the planning application stage. Mitigation measures could be implemented to ensure that any impact on amenity is minimised or negated. The Council does not consider that potential impact on amenity of existing residential properties would be significant.

Suitability of Alternative Sites

Various representations make reference to the fact that there are more desirable sites for development. It is the Council's submission that the inclusion of this site addresses the Council's identified desire to support and promote the existing

settlement at Peterculter.

Proximity of Pipeline

12: The proximity of a pipeline to the proposed site is known and acknowledged by the Council. It is not felt to preclude residential development at the site.

Water and Drainage

47, 171, 98, 171: The site falls within the River Dee catchment area. Various representations make reference to concerns in relation to water and drainage. It is the Council's position that the site is freely draining with no waterlogged areas and no flood risks have been identified by SEPA.

The Council therefore maintains that the allocation of this site for the residential development of 8 houses is appropriate and should be maintained.

OP109: Woodend Peterculter

Supports Local Community and Services in Peterculter

54, 83, 98, 126, 178, 183, 185 : Peterculter is a well-established settlement to the west of the city in Deeside. The Council considers that the continued vitality and viability of Peterculter is an important goal for maintaining Deeside as a whole. The Council recognises that in order to promote and protect local facilities, shops and infrastructure already present within Peterculter it is desirable and necessary to identify additional sites which are acceptable for residential development and have the potential to enhance the viability of Peterculter as a population centre. The Council would like to highlight that the local Community Council support the inclusion of this site.

Sustainability

The Council accepts that the site is outwith the existing settlement at Peterculter. It is also accepted that accessibility to the major road network and public transport facilities is poor. It is anticipated that the majority of residents at the proposed site would use their own vehicles for transport. It is the Council's submission however, that given the relatively small number of units proposed for this site the impact on sustainability will be minimal and therefore acceptable. The site is in close proximity to a site which has planning permission for a cricket pitch, club house and associated parking. The site is near to Core Path 51 (Garinhill Wood to Guttrie Wood) and Core Path 52 (Bucklerburn Road to Easter Anguston. The site is also near to Aspirational Path 4 (Peterculter to Milltimber). The school bus has an existing route through Woodend and refuse is already collected in the area. A safe pedestrian route to Culter Primary School exists from the site.

Housing

The Council's position is that the site would offer 19 residential units close to the city

for employment opportunities but would have the character of living within a countryside setting. The provision of a relatively small number of homes at the site is considered to contribute to a choice for home buyers of a range of properties available within the Aberdeen City boundaries and to contribute to mobility in the housing market in this area.

Environment

Various representations make reference to the woodland on the site. It is the Council's position that mitigation measures at the planning application stage could be implemented to minimise any loss of trees on the site. It is the Council's position that minimal loss of trees is an acceptable consequence of development contributing to the viability of Peterculter.

Schools

The zoned local Primary School, Culter Primary has excess capacity with capacity for 87 extra pupils in 2016.

Current Use

The current condition of the site is considered undesirable and it is the Council's submission that removal of the existing derelict and dilapidated farm buildings would be a positive outcome if the site were to be included for residential development.

Amenity

The Council does not consider that the inclusion of the site would cause significant detriment to the amenity of existing residential properties in the locality. It is the Council's submission that woodland to the north and south of the site would screen the development and provide natural mitigation for impact of development. Any question of amenity is something which would be dealt with at the planning application stage. Mitigation measures could be implemented to ensure that any impact on amenity is minimised or negated. The Council does not consider that potential impact on amenity of existing residential properties would be significant.

Suitability of Alternative Sites

Various representations make reference to the fact that there are more desirable sites for development. It is the Council's submission that the inclusion of this site addresses the Council's identified desire to support and promote the existing settlement at Peterculter.

Water and Drainage

It is the Council's position that there are no known flooding risks or drainage issues at the site. The Council therefore maintains that the allocation of this site for the residential development of 19 houses is appropriate and should be maintained.

OP42: Kennerty Mill

98: We welcome the support for the allocation of Proposed Plan Site OP42. Peterculter is a well-established settlement to the west of Deeside and is a recognised Neighbourhood Centre in the extant Aberdeen Local Development Plan 2012. The Council considers that the continued viability and prosperity of Peterculter is an important goal for maintaining Deeside as a whole. The Council has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a Neighbourhood Centre.

OP44: North Lasts Quarry

98, 65: We welcome the support for the allocation of Proposed Plan Site OP42. In response the Opportunity Site is identified for ongoing mineral extraction. There is no housing proposed and there for no requirement for affordable homes.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	ALTERNATIVE SITES: DEESIDE	12
Development plan reference:	No reference in the Plan	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Gary Purves of Knight Frank LLP on behalf of Mr McDonald (56)
Miss Shelley Thomson of Stewart Milne Homes (82)
Mr Ewan Maclean of Emac Planning LLP on behalf of Polmuir Properties Limited (84)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr John Findlay of Ryden LLP on behalf of Mr Russell Balsillie and Family (95)
Ms Lavina C. Massie on behalf of Culter Community Council (98)
Mr Roger Laird of Archial Norr on behalf of Parkie Property and Development Limited (103)
Mr Roger Laird of Archial on behalf of Mr & Mrs A.N. Ironside/Midstocket Development Company (106)
Miss Lucy Sumner of Halliday Fraser Munro on behalf of Shivas Trust/ D Gray & Others (122)
Mr Christopher Ross of Barratt North Scotland (125)
Ewan Maclean of Emac Planning LLP on behalf of Stewart Milne Homes (128)
Mrs Theresa Hunt of Burness Paull LLP on behalf of Mr Ian Suttie (133)
Mrs Theresa Hunt of Burness Paull LLP on behalf of Cults Property Development Limited (142)
Mr Steve Crawford of Halliday Fraser Munro on behalf of Mr W Donald (145)
Mr Gary Purves of Knight Frank on behalf of Rubislaw Estates (154)
Mr Fraser Littlejohn of Montagu Evans on behalf of E Yule Esq PER Kennedy Consultants (161)
Mr Colin Fraser of Park Home Estates (170)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Alternative sites in Deeside

Summary of the representation(s):

BIELDSIDE

Murtle Den & Surrounds, Bieldside (B0922)

84: Object to failure of site being included for one or two housing units. The proposed houses would fit with local character and there are recent precedents.

84(2) Object to the land zoning of bid site B0922 and the neighbouring land. The area is not justifiable part of the Green Belt.

Murtle Den, Bieldside

95: Land has potential to accommodate development without detriment to the area. No consideration given to Green Belt boundaries in the preparation of the Proposed Plan. SPP prepared after the Green Belt Review and takes a more relaxed approach. Development of Oldford Farm will result in a physical connection between Bieldside and Milltimber but they will be visually separate. Character would not be lost by removal of the Green Belt. There are precedents along the Deeside corridor. Redevelopment of Waterwheel Inn will be out of keeping with the area and demonstrates that Green Belt designation serves little purpose. Redrawing the Green Belt boundaries with the area removed would create stronger defensible boundaries. Green Space Network provides an additional layer of control that can work without the Green Belt.

CULTS

Thornhill, Craigton Road (B0924)

125: Object to the non-inclusion of site for a residential development of 150 units.

MILLTIMBER

Brookfield (B0902)

56: Site should be identified as a small scale greenbelt housing site for 20-30 houses for over 55's / retired / elderly persons. Consultation with the Cults, Bieldside and Milltimber Community Council has indicated there is a need for this type of specialist housing, as it is not being sufficiently provided for in the local area. Larger housing allocations in the local area such as Oldfold and Countesswells have not been delivered as originally anticipated. Development specific for this age group would not conflict with the delivery of other existing housing allocations at Oldfold or Countesswells. The site is immediately available and free from constraints. There would be no coalescence between Bieldside and Milltimber. The visual impact on the landscape would be relatively minor. The site sites adjacent to the Oldfold site and can be well contained within existing and proposed woodland. The site is highly sustainable in terms of proximity to public transport routes.

Contlaw (B0915)

85: Site should be identified for the development of a phased development comprising residential, business and commercial, local shopping provision and community facilities with associated strategic landscaping and public open space. Provision is also made a new primary school with associated playing fields. There will be no visual or physical harm to the landscape setting and identity of Milltimber. Officers' assessment of the site fails to consider the urbanising effect of the AWPR which will change the character of the area significantly and will provide a well-defined physical boundary to the west of Milltimber. A re-think of the Green Belt boundaries are required. Capacity constraints at Cults Academy are not an impediment to development and capacity could be increased through developer contributions. The site has good public transport links and could accommodate a

Park & Ride facility serving the A93 corridor. With its 9 hectares of employment land, the site would create a more sustainable Deeside.

West of Contlaw Road (B0946)

85: Site should be identified for the development of 10-15 residential units. This site could be developed as a stand-alone site or as Phase 1 of the larger Contlaw proposal. The AWPR which will change the character of the area significantly and will provide a well-defined physical boundary to the west of Milltimber. A re-think of the Green Belt boundaries are required. The site enjoys an attractive setting adjacent to an established residential area and within walking distance of bus routes along the A93 North Deeside Road. The site is also well placed to take advantage of the services and facilities available in Peterculter and Bieldside. The topography of the site and landscape features would ensure its containment in landscape terms and the development would have minimal impact on landscape setting. The scale of development proposed would not have a significant impact on infrastructure.

Guttrie Hill West (B0907)

106: Site should be included as a residential allocation for five houses with shared drive. The site is a brownfield site, previously used for quarrying. If any protected species are present, there will be mitigation measures. The houses can be adapted and therefore will provide a mix. The historic features on site will not be damaged. No negative impact on schools. The AWPR is in close proximity, and there is good public transport and paths.

Guttrie Hill East (B0908)

106: Site should be allocated as suitable for a sustainable energy vehicle refuelling station. This would create a charge point for electric vehicles, hydrogen refuelling for vehicles running on fuel cells, an LPG dispenser, in addition to conventional petrol and diesel. It would also include ancillary retail facilities, of the same scale as that found in a conventional petrol station. The site is ideally located at the Milltimber junction of the AWPR. Support for this type of development is provided at every level of hierarchy of planning policy in Scotland. There would be no negative impact on natural heritage, or cultural heritage. The Ancient Woodland status is outdated. The site relates well to the existing built up area of Aberdeen. The area will be subject to major change over coming years as a result of the AWPR.

Binghill Farm (B0933)

145: The site would act as a logical extension to the Oldfold site (OP48). The reasons for rejecting Binghill are not in any way robust. Transport does not provide an excuse for not zoning the land. The site is zoned as Green Belt and Green Space Network however the principle of development is established in a major housing site adjacent to Binghill Farm and nearby Countesswells. The medium to low density nature proposed for the site would not be overbearing to the character of the landscape and it would not extend north beyond the Oldford allocation. Its integration with the settlement would support a clear, defined physical boundary and not contribute to sprawl. Existing path access would be maintained and enhanced. Little

value would be retained through preventing development in favour of the Green Space Network. A small portion of the site would be developed, retaining land for open space, paths and access, and landscape retention. New allocations are scarce in Deeside and a low number of completions have taken place resulting in sites being carried forward. The allocation of small and medium scale sites is the key to reaching housing delivery targets.

Culter House Road (B0901)

154: The site is suitable for housing development (12 units) once the AWPR has been completed. The site does not warrant a Green Belt or Green Space Network designation for the following reasons: 1. Logical Greenbelt boundary is the AWPR, 2. The land is a gap site and development would infill between OP46 and OP47, 3. Removing the land from the Greenbelt will not lead to urban sprawl, 4. The land has little or no value in terms of providing a landscape setting or access to open space The site is free from constraints, there is already street lighting along Culter House Road, it is within walking distance of public transport routes and connects directly onto the footpath link to the AWPR. There are pavements up to the edge of the site and there is a Core Path Network in the vicinity. The indicative site layout includes a new cycleway/footpath through the middle of the site. Culter House Road will become a dead end once the AWPR is completed and the existing road network will be capable of accommodating a small increase in traffic. The only future housing allocation is Oldford which is controlled by one housebuilder and does not provide a choice. The site is on the Aberdeen side of the AWPR and will be well contained. The site is not visible from public vantage points. The AWPR will vastly change the character of the area and the identification of the site as part of the Green Belt does not protect or enhance the quality, character or landscape setting of the city. There is no public access to the countryside and the site offers nothing in terms of protecting or promoting wildlife, recreational or landscape access value to the wider Green Space Network.

Milltimber South (B0940)

183: Site should be allocated for 60 houses and associated commercial uses. Due to the constrained housing developments in the area, an additional 150 houses are required to be allocated in the period 2017-2026. Due to housing constraints elsewhere in the city the Deeside corridor would be able to accommodate approximately 1000 new homes. Design and landscaping would minimise visual impact. The current view will be replaced by one of the AWPR, routed 25-30 metres above current level. The delivery of the AWPR will provide convenient access for the site, via a grade separated interchange to the west.

PETERCULTER

Business Site, Peterculter

98: A small scale business park should be allocated adjacent to the urban part of Peterculter

Malcolm Road, Peterculter (B0943)

82: Object to the site (B0943) Malcolm Road not being included for 25 residential units. Site can be delivered, has good accessibility and close to amenities. Opportunity Sites 51, 52 and 109, in Peterculter, are not appropriate.

Land North of Peterculter (B0909)

103: Site is half a mile north of Peterculter and suitable for 8 houses. Demand for single storey houses for elderly. Shared access could be provided. Site previously rejected for being adjacent to a Special Area of Conservation and Local Nature Conservation Site but this is incorrect. Development could not be described as having an adverse effect on the landscape. Site is close to Peterculter and has better access than sites that are currently in Proposed Plan. Site is not at risk from flooding, there would be no adverse impact on the landscape, no restriction to open space access, and is adjoined by development on all sides. Small scale development would not impact infrastructure capacity.

Cobblestock, Peterculter (B0930)

122: South west end of Peterculter submitted previously. The Reporters previously had positive comments. There is scope for small scale development in Peterculter. No homes are planned for delivery in Phase 2 of the Proposed Plan. New housing allocations are limited while housing delivery targets continue to fall short. A range of small/medium sites which can be delivered are needed. In the Main Issues Report checklist the site scored higher than Mid Anguston but yet it was considered less acceptable. Site is closer and more accessible. The road network has capacity, the site is a logical extension and would not contribute to sprawl.

Rob Roy Mobile Home Park, Malcolm Road, Peterculter

170: Rezone land to Residential or Mixed Use. Currently a developed residential site for 101 park homes within the Greenbelt. In a position to replace with new Mobile Homes (Park Homes) or replace with conventional homes and remove from Green Belt. Lifespan and value would be more. Park Home residents have the right to stay for the duration of the owner's life. If mobile homes are replaced it will remain as such for the foreseeable future. Site has mains sewerage, hydro-electric substation, there is a pavement and street lights. With the AWPR there will be no difference in traffic between park homes and conventional housing. Only opportunity to change to conventional housing and would be classed as brownfield development.

Hill of Ardbeck, Peterculter (B0934)

183: Object to non-allocation of Hill of Ardbeck for 61 houses, improved management of open space and contribution to recreational facilities. Constrained housing developments elsewhere have resulted in Deeside being able to accommodate approximately 1000 homes. Part of site has Ancient Woodland and is a Local Nature Conservation Site. Development limited to the bowl to minimise environmental and visual impacts. Site previously supported by the Reporter in 2008 when submitted as sheltered housing. Would provide 25% affordable housing and

create a better recreational resource than overgrown area that it is now.

Peterculter East (B0935)

183: Object to the non-allocation of Peterculter East for 38 houses and a business park. Due to constrained housing developments there is a requirement for additional houses and the Deeside corridor could accommodate new homes. The AWPR will improve connectivity and the grade separated junction will provide direct access to the site. Site will provide employment opportunities and is a logical infill. Housing will contribute to needs. Both the business park and housing are free from constraint.

Newmill, Peterculter (B0937)

183: Object to the non-allocation of Newmill. Site split between the City and Shire boundary. Due to constrained housing developments there is a requirement for additional houses and the Deeside corridor could accommodate new homes. It would be masterplanned, landscaped, delivered quickly and help to address the shortfall in residential and business land allocations.

Kennerty Farm, Peterculter (B0938)

183: Object to the non-allocation of Kennerty Farm, Peterculter for 22 houses. Due to constrained housing developments there is a requirement for additional houses and the Deeside corridor could accommodate new homes. The site will meet housing requirement and is a logical extension to the settlement. Close proximity to Local Nature Conservation Site and Special Area of Conservation. Drainage and landscaping will be provided to mitigate and enhance the area.

PITFODELS

Parklea House

133: Garden ground of Parklea should be removed from the Green Belt and rezoned as R1: Residential. The Appraisal notes that Parklea's garden ground does not meet any principles of the Green Belt policy such as to warrant retention of that designation. It demonstrates the removal of the Green Belt designation from Parklea will (1) not affect the important characteristics of the landscape setting of Aberdeen; (2) create a more defensible road boundary to the Green Belt by using an existing road - Baird's Brae and (3) rationalise the Green Belt in this location to reflect the local characteristics of the area.

Inchgarth Road Residential and Link (B0912)

142: Objects to the non-allocation of the site for 100 residential units and the provision of a new link road from Inchgarth Road to North Deeside Road, and the removal of the site from the Green Belt and Green Space Network. The site would be developed taking into account the local context, sustainable transport and the link road would be beneficial to the wider network, for pedestrians, cyclists and a

potential new bus route.

Inchgarth Road Mixed Use and Link

142: Object to the non-allocation of the site for 300 units of student accommodation, all weather pitch, 60 residential units and a link road, and the removal of the site from the Green Belt and Green Space Network.

Student accommodation fulfils a specific need within the city as is outlined in Policy H5: Affordable Housing and the supporting Supplementary Guidance. Communities facilities are also supported within the Local Development Plan as is outlined in Policy CF2: New Community Facilities. Community facilities include education related facilities.

The site would be developed taking into account the local context, sustainable transport and the link road would be beneficial to the wider network, for pedestrians, cyclists and a potential new bus route.

Land at Station Road, Pitfodels

142: Objects to the non-allocation of 0.8 hectare site for three residential units and landscaped grounds. Remove the site from the Green Belt and Green Space Network. The site would be developed taking into account the local context and sustainable transport, and would be absorbed easily into the settlement.

Land at Pitfodels Station Road, Cults

161: Remove the site from the Green Belt and designated for three no. detached residential units. Infill development contributes to the housing land supply, and development of this site would not undermine the Green Belt Policy but would provide a more defensible Green Belt Boundary along the line of the South Deeside Way.

Craigton Road (B0939)

183: Object to the non-allocation of Craigton Road for 32 houses and a care home, with woodland buffers. Due to constrained housing development in the area, and beyond new housing could be accommodated in the area. Allocating the site would create a more defensible Green Belt boundary.

WESTHILL

Cadgerford and Backhill Westhill (B0931/B0932)

128: Object to the non-allocation of B0931 and B0932 and a development site of 6 hectares of employment land and 600-700 homes on Aberdeen City side of the site. A cross boundary Masterplan is advocated for the site. Development strategy has been prepared. The Westhill Capacity Study (Aberdeenshire Council) indicates growth will continue to Westhill. Housing allocations are needed to balance

employment land. The site is accessible, in close proximity to local facilities and could assist with infrastructure issues.

Modifications sought by those submitting representations:

BIELDSIDE

Murtle Den & Surrounds, Bieldside (B0922)

84: Identify land at Murtle Den for the allocation of one or two detached houses.

84: Identify site and the neighbouring land (shown by the blue boundary) as H1: Residential Areas.

Murtle Den, Bieldside

95: Green Belt zoning should be removed and identified as a residential area.

CULTS

Thornhill, Craigton Road (B0924)

125: Remove from the Green Belt and allocate as Land Release 1.

PETERCULTER

Malcolm Road, Peterculter (B0943)

82: Delete sites OP52 and OP109. Allocate site for 25 residential units and associated infrastructure for release within the first 5 years.

Land North of Peterculter (B0909)

103: Site should be included in the Local Development Plan.

Cobblestock, Peterculter (B0930)

122: Change land zoning to Residential

Rob Roy Mobile Home Park, Malcolm Road, Peterculter

170: Change zoning from Green Belt/brownfield to Residential or Mixed Use.

Hill of Ardbeck, Peterculter (B0934)

183: Allocate site for 61 houses.

Peterculter East (B0935)

183: Allocate the site for 38 houses and a business park.

Newmill, Peterculter (B0937)

183: Remove the Green Belt status and allocate the site.

Kennerty Farm, Peterculter (B0938)

183: Allocate site for 22 houses.

PITFODELS

Parklea

133: Removed the garden ground from the Green Belt zoning.

Inchgarth Road Residential and Link (B0912)

142: Remove the site from the Green Belt and Green Space Network and allocate for residential and a new link road.

Inchgarth Road Mixed use and Link

142: Remove the site from the Green Belt and Green Space Network. The land should be identified as an Opportunity Site

Land at Station Road, Pitfodels

142: Remove the site from the Green Belt and Urban Green Space and allocate for Residential development

Craigton Road (B0939)

183: Allocate the site for 32 houses and a care home

WESTHILL

Cadgerford and Backhill Westhill (B0931/B0932)

128: Allocate 6 hectares of employment land and 600-700 houses.

Summary of response (including reasons) by planning authority:

General Strategy

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27), and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

BIELDSIDE

Murtle Den & Surrounds, Bieldside (B0922)

84: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Any development of this site would be prominent from North Deeside Road, particularly when travelling west. Although next to the allocated site at Oldford, Murtle Den Road provides a good Green Belt boundary for development to the west. Murtle Den Road is tree lined and helps to screen and contain Oldford. The effect of this would be lost if development occurred here. The topography and woodland around Murtle Den prevents visual and physical coalescence between Milltimber and Bieldside. The site contributes to the landscape setting of the area and should remain zoned as Green Belt. Further detail on the justification of the Green Belt boundary in this locale can be found in Figure 15 of the Green Belt Review (CD38) which examined the boundaries of the allocated sites identified in the extant Local Development Plan 2012.

Murtle Den, Bieldside

95: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The topography and woodland around Murtle Den prevents visual and physical coalescence between Milltimber and Bieldside. The land at Murtle Den is important to maintaining the separate identities of the two communities and development on this site would lead

to coalescence. The exclusion from Green Belt areas of existing built development, or sites which may offer some re-development opportunities would be contrary to the purpose of encouraging development to locate within the existing built-up area of the city, or on various large areas of land allocated specifically for new development. Therefore, the site contributes to the landscape setting of the area and should remain zoned as Green Belt.

CULTS

Thornhill, Craigton (B0924)

125: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site was previously assessed at Pre-Main Issues Report stage (Pre-MIR) and was deemed undesirable for development (CD28). The unit number was unspecified at Pre-MIR stage. The site was considered and rejected by Reporters following the Examination of the 2012 Local Development Plan (Issue 53, CD44). The development would constitute a substantial but isolated development in the Green Belt undermining the existing separation between Cults and Aberdeen. The site is remote from transport links and there is insufficient school capacity as is outlined in the Proposed Plan Site Assessment Report.

MILLTIMBER

Brookfield (B0902)

56: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site is situated in an area of wooded farmland which acts as a buffer between Milltimber and Bieldside and occupies a very significant visual point as one travels towards Milltimber. Development on this site would therefore impact on the surrounding landscape and school capacity constraints should also be specifically noted (as it should not be assumed that no children would be generated from the development). It is noted that the proposal is for over 55's housing for retired / elderly persons. Outcome 6 of the Aberdeen Local Housing Strategy 2012-2016 (RD59) is to: "Improve the housing experience for all vulnerable groups with particular housing needs and in particular minority groups so they can live independently through the provision of accessible accommodation and support systems", which includes ensuring the provision of suitable housing stock to meet the needs of an increasing elderly population. It is considered that the mix of house types and tenures on sites already allocated within the Deeside area will assist with meeting this Outcome and there is no overriding need for this type of specialist housing which would override the Council's decision not to allocate this site for development.

Contlaw (B0915)

85: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Public Local Inquiry into the 2008

Local Plan (Issue 83, CD45) and the Examination of the Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. Most of the site would be a long walk from the bus route on North Deeside Road although it is acknowledged that the site is large enough to accommodate its own facilities. Development of this site would have significant landscape impact, particularly the areas which are above the 90 to 95 metre contour line within which most of Deeside is contained. The presence of the Aberdeen Western Peripheral Route (AWPR) through this area makes it even more important to maintain a green buffer between Milltimber and Peterculter. Contlaw Road itself and the woodland north of Milltimber provides distinct Green Belt boundaries and these features serve to contain the settlement and protect its identity. The Green Belt functions of the area should therefore be maintained.

With regards the suggestion by the Respondent that the capacity at Cults Academy could be increased by way of developer contributions, the school was built to take the maximum number of pupils for the size of the site. As such, the possibility of extending the school would be technically complex and could not be delivered while staff and pupils were in the building. School capacity constraints therefore remain important consideration for this proposal.

West of Contlaw Road (B0946)

85: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. The site proposes development on land between the Aberdeen Western Peripheral Route and Milltimber and on land included within the Green Space Network. Coalescence with Peterculter has been a reason in the past that development has been resisted in this area. The site is situated in an attractive landscape setting which provides a green wooded backdrop to Milltimber. The woodland along with Contlaw Road itself provides a clearly defined boundary between Milltimber and the Green Belt in this area. Development on this site would impact on the surrounding landscape, and, although the proposal is for a small scale development, capacity constraints, particularly at Cults Academy, would also impact upon the suitability of this site.

Guttrie Hill West (B0907)

106: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site is covered in its entirety by Ancient Woodland, is designated as a Local Nature Conservation Site (LNCS), and is also a habitat for protected species including bats and red squirrel. The biodiversity value of the site would be negatively impacted by development. The site is in a highly unsustainable location, being completely unrelated to existing settlement at Culter and an unacceptable distance from local facilities and employment opportunities. There are also capacity constraint issues at Cults Academy, although it is noted that the proposal is only for five units (and that this

number has been reduced from previous submissions).

Guttrie Hill East (B0908)

106: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. Although felled, this site retains its formal status as Ancient Woodland, although it is clear that is biodiversity value has been significantly diminished. The main constraints affecting this site are its isolation from existing settlement and inaccessibility by walking, cycling or public transport. It is unlikely that effective links would be able to be made to encourage this. Although direct access to the strategic road network is needed for a vehicle refuelling station, this proposal would form an isolated outpost of development, accessible only by car from the AWPR. A 'ribbon' of small, isolated developments along the Aberdeen Western Peripheral Route is not considered to be a desirable or sustainable desirable pattern of development.

Binghill Farm (B0933)

145: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. The site would not sit well in the landscape given that it is located above the 90-95 metre contour line on the Deeside Valley which generally marks the northern limit to development of the north Deeside settlements. Breaching this could lead to urban sprawl northwards. The site also has limited facilities within 800 metres and there are school capacity constraints, particularly at Cults Academy.

Culter House Road (B0901)

154: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. This proposal covers land that was previously Ancient Woodland but has now been felled. This development would be in an unsustainable location on the edge of Milltimber. There are also school capacity issues associated with this proposals, particularly at Cults Academy. It is considered that the Green Belt and Green Space Network allocations should be retained.

Milltimber South (B0940)

183: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan 2012 (Issue 53). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. The site is

designated as Green Belt and Green Space Network as it allows good views across the Dee Valley – as such development would impact on the River Dee Valley landscape as development would be very prominent from North Deeside Road and from the River Dee itself. The area contributes to a sense of place and to landscape setting and should therefore remain as Green Belt and Green Space Network. There are also school capacity constraints, particularly at Cults Academy.

PETERCULTER

Business Site, Peterculter

98: No site has been identified to support the request for more business land to be provided at Peterculter. The Spatial Strategy of the Proposed Plan complies with the employment land allocations set out in the Strategic Development Plan, therefore there is no requirement to allocate more business land.

Malcolm Road, Peterculter (B0943)

82: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan 2012 (Issue 52). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Site Assessment Report. The site is not considered suitable for development due to its isolation and poor accessibility to employment opportunities, local facilities and public transport. The proposal is poorly related to the main settlement at Peterculter and is part of the countryside north of Malcolm Road which serves to maintain its setting. It is part of the green backdrop to Peterculter which contributes to protecting its landscape setting. It should therefore remain as Green Belt.

Land North of Peterculter (B0909)

103: We do not propose to allocate this site for development. The site was previously considered during the Main Issues Report stage and rejected as being unsuitable for development as set out in the Pre-Main Issues Report Development Options Assessment, Issue 3 (CD28). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. The site is not considered suitable for development due to its isolation and poor accessibility to employment opportunities, local facilities and public transport. The proposal is poorly related to the main settlement at Peterculter and is part of the countryside north of Malcolm Road which serves to maintain its setting. It is part of the green backdrop to Peterculter which contributes to protecting its landscape setting. It should therefore remain as Green Belt.

Cobblestock, Peterculter (B0917)

122: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 52). It has since been resubmitted as a development bid

with a reduced area and a proposal for 15 units. We are still of the same opinion that the site at Cobblestock is unsuitable for development. Road access is extremely poor - it is a narrow, single track, steep and with sharp bends in places. The physical characteristics of the access roads and the presence of gardens and houses next to it could restrict road widening and will make this a difficult issue to mitigate.

Rob Roy Mobile Home Park, Malcolm Road, Peterculter

170: We do not propose to allocate this site for development. The site is not considered suitable for development due to its isolation and poor accessibility to employment opportunities, local facilities and public transport. The proposal is poorly related to the main settlement at Peterculter and is part of the countryside north of Malcolm Road which serves to maintain its setting. It is part of the green backdrop to Peterculter which contributes to protecting its landscape setting. It should therefore remain as Green Belt.

Hill of Ardbeck, Peterculter (B0934)

183: We do not propose to allocate this site for development. The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan (Issue 52). Aberdeen City Council has reassessed this site, again considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Plan Site Assessment Report. Its recreational use and designation as a Local Nature Conservation Site makes it an undesirable development option and it should remain as Green Belt.

Peterculter East (B0935)

183: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).Development on this site would be very prominent from the Aberdeen Western Peripheral Route and would have a significant impact on the surrounding landscape. Any development would only partially be related to the main settlement of Peterculter and its shops and services. The Proposed Plan identifies sufficient greenfield housing land. Therefore, we do not think this site should be rezoned from Green Belt and believe the current zoning reflects the site more appropriately.

Newmill, Peterculter (B0937)

183: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).Development would be likely to have a significant impact on the surrounding landscape and may have a negative effect on the species and habitats of the Culter Burn Local Nature Conservation Site, which is adjacent to the site. The site would be poorly related to the existing settlement at Peterculter and isolated from shops and services, meaning that it is likely to be heavily car-dependent.

Kennerty Farm, Peterculter (B0938)

183: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).Development would have a significant impact on the surrounding landscape and any development would only be partially related to the main settlement of Peterculter and its shops and services.

PITFODELS

Parklea

133: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site lies within the Pitfiodels Conservation Area where the pattern of development and setting creates a visual break from the urban pattern of Aberdeen City. The area is characterized by large detached villas set within spacious landscaped gardens with generous tree planting. This relates back to the original feu splitting of 1845. The building plots between North Deeside Road and Rockland Road/Airyhall Road have a very distinctive pattern comprising a tiered arrangement of frontage tree belts and open lawns and further trees set around the buildings. The properties are typically around 100 -200 metres set back from North Deeside Road. Behind the building is another tier of lawns and/or tree belts adjacent to Rocklands Road. Parklea forms the western most boundary of the Green Belt on the north side of North Deeside Road and follows the pattern of development as described above, and therefore established a defensible Green Belt boundary. The Green Belt designated extends to the east and south of the site again reflecting the historic pattern of development of the area, therefore reflecting the local characteristics and maintaining the visual break between the city and Pitfodels.

Inchgarth Road Residential units and a link road (**B0912)**

142: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). Development would have a significant impact on the Deeside Line Local Nature Conservation Site with a new road having to cross this area and with a likely impact on the trees and the setting of the Green Belt and Pitfodels Conservation Area. The 'Access from the South' study is exploring the merits of a link road between Inchgarth Road and North Deeside Road as part of a wider solution combined with the proposals for the Bridge of Dee (RD60). The Access from the South Study is not due for completion until late Summer/Early Autumn 2016. This site is located within the Pitfodels Conservation Area and is Green Belt, providing significant visual separation between Garthdee and Lower Deeside which protects their separate identities. It therefore contributes to the landscape setting of these settlements. Although there are other developments in this area, its predominant character is still

rural. This, together with the tree cover, prevent both visual and physical coalescence of Garthdee and Cults. Further development would shift the balance from a predominantly rural to a more urban character. This site is an important part of the area which prevents coalescence and therefore serves a Green Belt function that should remain.

Inchgarth Road Mixed Use and Link Road

142: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The development would have a significant impact on the Deeside Line Local Nature Conservation Site with a new road having to cross this area and with a likely impact on the trees and the setting of the Green Belt and Pitfodels Conservation Area. The Access from the South Study is exploring the merits of a link road between Inchgarth Road and North Deeside Road as part of a wider solution combined with the proposals for the Bridge of Dee. The Access from the South Study is not due for completion until late Summer/Early Autumn 2016. This site is located within the Pitfodels Conservation Area and is Green Belt, providing significant visual separation between Garthdee and Lower Deeside which protects their separate identities. It therefore contributes to the landscape setting of these settlements. Although there are other developments in this area, its predominant character is still rural. This, together with the tree cover, prevent both visual and physical coalescence of Garthdee and Cults. Further development would shift the balance from a predominantly rural to a more urban character. This site is an important part of the area which prevents coalescence and therefore serves a Green Belt function that should remain.

Land at Station Road, Pitfodels

142: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. This site is located within the Pitfodels Conservation Area and the area is currently Green Belt, which provides significant visual separation between Garthdee and Lower Deeside and which protects their separate identities. It therefore contributes to the landscape setting of these settlements. Although there are other developments in this area, its predominant character is still rural. This, together with the tree cover, prevents both visual and physical coalescence of Garthdee and Cults. Further development would shift the balance from a predominantly rural to a more urban character. This site is an important part of the area which prevents coalescence and therefore serves a Green Belt function that should remain. There is limited school capacity; Cults Primary School will be over capacity by 2016, and Cults Academy by 2021.

Pitfodels

161: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site is part of the Green Belt buffer between Cults and Garthdee which helps to maintain their separate identity and contributes to the landscape setting of Aberdeen. The site is

within the Pitfodels Conservation Area which is characterized by large detached villas set within spacious landscaped gardens with generous tree planting. This relates back to the original feu splitting of 1845. Green Belt is the predominant zoning within the Conservation Area. Although there are other developments in this area, its predominant character is still rural. This, together with the tree cover, prevents both visual and physical coalescence of Garthdee and Cults. Further development would shift the balance from a predominantly rural to a more urban character. This site is an important part of the area which prevents coalescence and therefore serves a Green Belt function that should remain. There is limited school capacity; Cults Primary School will be over capacity by 2016, and Cults Academy by 2021 (CD32).

Craigton Road (B0939)

183: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site was zoned as OP64 within the extant Aberdeen Local Development Plan 2012 with a residential use for 20 units. Planning permission (P110020) was granted in May 2012 for the erection of residential development comprising of 20 units, which are now built and occupied, and have satisfied the Opportunity Site allocation. A care home was approved in 2009 (P090141) with notice of completion submitted in 2013. A further application (P131354) was refused for five terraced units, and upheld on appeal (PPA-100-2060) with the Reporter citing landscape setting, conservation area character, the mature wooded areas associated with the original development of Airyhall House, amongst other more detailed reasons related to the design, material and layout of the development proposal, as reasons for upholding the refusal..

This site plays an important role in separating the settlements of Aberdeen and Cults and is therefore an important part of the Green Belt. The site also contains many mature trees and has an established wildlife and recreational function. The site is semi-rural and wooded in context. The existing development reflects the character and appearance of Airyhall Road.

WESTHILL

Cadgerford, Westhill (B0931)

128: We do not propose to allocate this site for development. The site was previously considered during the extant Local Development Plan 2012 Examination and rejected (CD44, Issue 37). Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The Site Assessment Report highlights the presence of a major gas pipeline which constrains the site. The site is remote from the built up area of Westhill and the accessibility of the site is therefore quite poor and difficult to integrate with the existing settlement. Any development would be considered to pose a significant impact on the surrounding landscape. It is part of the open countryside which separates Kingswells and Westhill, and serves a vital Green Belt function by maintaining their separate identities and landscape settings.

Backhill, Westhill (B0932)

128: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31).The presence of a major gas pipeline constrains the site. Development would also intrude significantly into the rolling agricultural landscape which surrounds Westhill, and helps to maintain the separate identities of Westhill and Kingswells. Therefore this land performs a vital function as Green Belt and it would not be appropriate to allocate this land for development.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	ALLOCATED SITES & GENERAL AREA STRATEGY: LOISTON & COVE	13
Development plan reference:	Page 15, 86, 87, Proposals Map, Table 8, Table 8 notes, Materplan Zone table, Appendix 2, Appendix 4, Appendix 5, Policy R4	

Body or person(s) submitting a representation raising the issue (reference no.):

Mrs Gillian Laing (6)
Miss Sandra Thomson (8)
Ms Kirstin McKenzie (10)
Miss Lynn McVeigh (21)
Mr Roderick Menzies (25)
Mrs Heather Watt (28)
Mr Scott Morgan (29)
Ms Jennifer Elrick (30)
Mrs Shona Evans-Morgan (33)
Mr David Fryer of Torry Community Council on behalf of Torry Community Council (35)
Miss Stephaine O'Callaghan of QUOD on behalf of Scotia Gas Networks (SGN) (40)
Ms Lorraine Jones of sportscotland (41)
Mrs Marie Milton (45)
Mr Ian Stark (55)
Mr John Findlay of Ryden LLP on behalf of Cyan Properties Limited (57)
Mr Rab Dickson of the North East of Scotland Transport Partnership (59)
Mrs June Stark (60)
Booker Limited on behalf of Makro Self Service Wholesalers Ltd (62)
Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of Leiths (Scotland) Limited (65)
Mr Michael Hyde (68)
Ms Mhairi Johnston (69)
Dr Sandie Munro of Torry Medical Practice (70)
Mrs Wendy Buchan (72)
Miss Jennifer Paton (86)
Kris Furness of SITA UK (91)
Mr Malcolm Campbell of Knight Frank LLP on behalf of Hermiston Securities Limited (93)
Miss Jodie Stark (96)
Mr Alan Strachan of Nigg Community Council (111)
Mr Ian Cowe of Forestry Commission Scotland (126)
Mr Andrew Philp (135)
Mrs Theresa Hunt of Burness Paull LLP on behalf of Aberdeen Football Club (146)
Ms Michele McPartlin of Cove and Altens Community Council on behalf of Cove and Altens Community Council (147)
Miss Katie McLachlan (169)
Miss Laura Ferguson (176)
Mr Ben Freeman of Bancon Developments (183)
Mrs Lucy Philip (186)

Provision of the Development Plan to which the issue relates:	Overview of Direction for Growth in this area and specific OP sites

Summary of the representation(s):

OP58: Stationfields

Environment/Wildlife

6, 8, 10, 25, 28, 29, 30, 33, 45, 55, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: Housing development will result in loss of wildlife such as bats and deer, and green and open space. Bats are a European Union protected species. Local flora and fauna will be destroyed by development. Loss of Green Belt impacts on nature conservation areas.

96: Negative impact on Fowsleugh nature reserve as the cliffs are used as breeding ground by seabirds.

Transport Issues

6, 8, 10, 21, 25, 28, 29, 30, 33, 45, 55, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: Traffic is already busy at rush hour times and housing development will only increase this. Roads are narrow and unable to cope, especially Coast Road. There are inadequate transport facilities. Other developments add to the traffic. Increase in traffic will affect air quality.

10, 45: A new station would be good to link Cove with Aberdeen, and it would reduce traffic.

29, 33, 86: Building houses will deny residents the possibility of a train station

45: Area around railway station could be landscaped to provide habitat for wildlife and improve air quality, noise and congestion.

69: Permission for 150 houses shouldn't go ahead while a decision on building a railway station is pending. The rail halt proposal is not visible in the Proposed Plan and is not referred to in the most recent neighbour notifications.

147: Proposed Plan doesn't mention provision of a railway station. If this is not provided there is no need to develop the site. It should be returned to Green Belt and community facilities provided instead.

169: There is existing shortage of parking. Additional housing will only compound this.

Inadequate Facilities

6, 8, 10, 21, 25, 28, 29, 30, 33, 45, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: facilities such as shops, healthcare, sewage, community centre. No leisure facilities

in the area. There are already too many houses and there are additional ongoing developments in and around Cove.

Landscape

8, 28, 69, 96, 186: Additional development will spoil general views and views over the sea.

68: The Council should consider more creative and forward thinking uses for how to develop beautiful landscapes around the city.

Education

28, 29, 30, 33, 69, 86, 96, 135, 169, 186: Loirston Primary School is already stretched; the development will overload it. Schools are already at capacity.

General

21, 72: Housing development is very close to railway line and is unsafe for children.

28: Development being described as 'low-cost' brings concerns of security. This will negatively impact the value of homes.

68: Extra houses will only benefit the developers. There is no evidence of building communities, just houses.

96: Development should be targeted towards redeveloping brownfield sites in central Aberdeen.

186: Clear plans need to be agreed by local residents to take account of any raised concerns

Cove Masterplan and Charette Report

69: Disagree that current Cove Masterplan and Charette is out of date and no longer relevant. Developing Stationfields contradicts the Masterplan's 'Vision' for Cove to 'create a coherent and interconnected public open space that connects to the natural and agricultural landscape'. Planners are sacrificing good planning to meet targets and make money.

147: Who will carry out the new Cove Masterplan and when will it be commissioned?

OP54: Altens East and Doonies

General

35: Respondent requests a number of conditions be attached to any planning permission for OP54. Copy of letter submitted to Development Control Manager also

submitted as part of representation.

Supports Allocation

91: Strongly support the allocation and safeguarding of land for the development of a materials recycling facility/a refuse derived fuel plant and a depot for the Council's collection fleet.

LOIRSTON AND COVE

Torry

35: Regrets that key sites in Torry have been placed under 'Loirston and Cove' heading. Torry is a community with strong architectural and spatial character, not a dormitory.

Traffic

35: There is an increase in commuter and commercial traffic due to developments outwith Torry, which has led to air pollution particularly in Wellington Road and Market Street. Lorries should be banned to protect the residential character of the area. There should be a new bypass built in Torry to protect health and the built environment. Road and infrastructure must be implemented prior to development; however, the south of River Dee is already overdeveloped. This has resulted in inadequate roads and a lack of safety for pedestrians.

Torry Academy

35: This site should remain in use for education and the community.

Walker Road School

35: Recommend that this school becomes a Listed Building because of its architectural character.

East Tullos Industrial Estate

35: This is the oldest industrial estate in Aberdeen and is in need of de-industrialisation and modernisation.

Consultation

35: Full and early consultation should be undertaken with Torry Community Council to establish appropriate development for the community's benefit.

Housing Capacity

183: Only 75 units are expected to be delivered up to 2016, giving a shortfall of 1025 units. However, the Housing Land Audit anticipates that the remainder will be

built out before 2026. No further development is planned for this extensive area of the city, beyond 2026.

OP103: Former Torry Nursery School

35, 70: Site should be reserved for health and social care uses. Torry Medical Practice has seen an increase of patients from 3,000 to over 7,000 patients. The current care system is poorly funded and an increase in population will lead to a future care crisis.

OP107: East Tullos Gas Holding

35: Oppose identification of the site for an Energy from Waste facility on grounds of public health, air pollution and increased presence of commercial vehicles on an over-stretched and inadequate network of roads.

40: Object to zoning of site as business and industrial use.

OP104: Craiginches Prison

35: Welcomes creation of affordable homes and awaits details of scheme layout and impact on local roads and schools.

OP60: Charleston

Business & Industry Use

93: OP60 should be changed from employment use to business and industry and phasing brought forward to 2017-2026. High take up of employment in Aberdeen suggests the city will run out of suitable Class 5 and 6 before 2027. Proposed Plan should identify additional land to meet future requirements to maintain the 70 hectares of future growth.

Increased Traffic

111: This development and other proposed developments in the area will generate an increase in traffic, all of which join Wellington Road (A956), which currently suffers congestion at peak periods. A956 junction capacity improvements, as stated in Section 5 of the Main Issues Report will be unable to deal with the increased traffic. The whole A956 and its associated junctions should be subject to 'capacity improvements'.

OP59: Loirston

Increased Traffic

111, 147: This development and other proposed developments in the area will generate an increase in traffic, all of which join Wellington Road (A956), which currently suffers congestion at peak periods. The whole A956 and its associated

junctions should be subject to capacity improvements before any houses occupy the site.

General Support

146: Supports allocation of site for a new football stadium. It's in accordance with Scottish Planning Policy, paragraph 226 and this requirement was identified in the Strategic Development Plan.

OP61: Calder Park

111: This development and other proposed developments in the area will generate an increase in traffic, all of which join Wellington Road (A956), which currently suffers congestion at peak periods. A956 junction capacity improvements, as stated in Section 5 of the Main Issues Report will be unable to deal with the increased traffic. The whole A956 and its associated junctions should be subject to 'capacity improvements'.

OP64: Ness Tip

126: Site is not ideal as it is partially afforested. Scottish Planning Policy and Scottish Government Policy in the Control of Woodland Removal state a general presumption in favour of protecting woodland sites. If an alternative site is not available then mitigation planting should be required with any future development consents.

OP62: Nigg Bay

137: Respondent notes that the harbour proposals have evolved and the footprint is now different to that of National Planning Framework 3 and the Proposed Plan.

The land zoned under Policy B5 should be subject to further adjustment to reflect the draft Harbour Revision Order Boundary and the southern breakwater. The Headland at Greg Ness will likely be used as a temporary construction and manufacturing area during the construction of the breakwater, Post construction the headland would be reinstated, but with an access road retained to enable access for breakwater maintenance. It is not proposed this area would form part of the Harbour Revision order, not part of the harbour's land ownership or permanent lease.

35: Open and green space around Torry should be preserved. Any proposals to change the natural environment character and open space should be subject to public consultation.

General Support

59: Supports creation of new deep water harbour facility at Nigg Bay and welcomes its inclusion in Proposed Plan.

Woodland

126: Site is not ideal as it is partially afforested. Scottish Planning Policy and Scottish Government Policy in the Control of Woodland Removal state a general presumption in favour of protecting woodland sites. If an alternative site is not available then mitigation planting should be required with any future development consents.

Doonies Farm

147: The proximity of the Recycling Centre and the indication from the Proposed Plan that fields near and beyond the Bridge of One Hair are to be taken over imply that Doonies Farm will not remain.

Land-Use Change

35: No consents should be given to by-pass or expedite any change of use of lands, such as in the provisions of the Harbour Revisions Act.

OP110: Wellington Circle (Former Makro)

Support for Allocation

57, 62, 147: Support the identification of the site as a potential Class 1 use site.

57: The Council's Retail study identified a need. The site identified in the extant Local Development Plan at Altens Thistle Hotel has not delivered (it has recently been refurbished and there remains an unexpired lease on the site). The allocation of the Makro site as an opportunity for retail use will address a longstanding deficiency in retail provision to the south of the city. Makro site lies immediately opposite the site allocated in the extant Local Development Plan and will serve the same catchment area (including new development areas in the vicinity). The site currently benefits from a wholesale retail use with associated service access and car parking infrastructure. The proposal also utilises an existing building. The site is easily accessible by foot and cycle. The proposal safeguards existing jobs and creates new employment opportunities as well as providing a much needed retail facility for the existing communities. There is public support for the site. There is no alternative site capable of delivering a supermarket use to serve the existing communities and areas of future housing. The Makro site is capable of delivering a supermarket use in the short term. The Councils assessment of the site identified it as "highly suitable for development" and scored highly in the Assessment Matrix. The Council's Communities, Housing & Infrastructure Committee determined to include the Makro site within the Proposed Plan as OP110 at their meeting on 28 October 2014. There is a live planning application pending for the part change of use of the Makro building to accommodate a supermarket of 5,750 square metres. Modifications sought to paragraph 3.28 and Proposals Map to reinforce Opportunity Site designation.

62: Makro wish to continue trading from current location but the building is too large

for their requirements. Pending planning application provides Makro the opportunity to downsize, secure their continued presence on the site and retain local employment.

Traffic Concerns

111: The proposed development will generate a significant increase in the volume of traffic within the area, all of which join the A956 (Wellington Road) which currently has significant congestion at peak periods. Respondent listed other proposed development, or developments already under construction which will exacerbate the current A956 congestion. Respondent refers to projects listed in Main Issues Report Section 5 Infrastructure and Transport. States that bullet point "A956 Junction Capacity Improvements" will be insufficient to deal with the increased traffic and promotes that the whole A956 and its associated junctions should be the subject of "Capacity Improvements".

147: Concerns about level of traffic in and around site OP110 due to recently approved Travellers' Site and new proposed South of the City Secondary School. Road improvements identified for OP59 must be carried out before this development commences. Or new revised traffic lists should be installed at the Wellington Circle entrance to the roundabout so that cars can exit the site easily and freely.

Object to Allocation/Alternative Site Promoted

93: Respondent wants to see opportunity for retailing/proposed supermarket at OP110 deleted from the Proposed Plan and transferred to OP59 at Loirston. At the Main Issues Report Committee the Planning Officers recommended that Loirston was identified for retail development, however the Committee did not support this and allocated the site at Makro. No justification was provided. Location at OP110 is not suitable for Class 1 supermarket. It is located within an area allocated for Business and Industry. It is important to safeguard the supply of existing industrial and business land situated in strategic locations. Demand for employment land and Class 5/6 remains high in Aberdeen and in the south of the city. Land should not be lost to non-industrial uses.

93: Alternative site at Loirston recommended by the Respondent. The Loirston site can accommodate suitable retail development within the identified retail centre in the Loirston Development Framework and would help anchor a viable village centre in this location. The site at Loirston is deliverable and located to serve the south of the city. It will be accessible by public transport and can be accommodated on the local traffic network. The site is considered to have sufficient prominence to attract an operator to the site. An application is pending determination for retail development at Loirston (P141754).

OP105: Kincorth Academy

41: Consideration should be given to whether the outdoor sports facilities on site serve a community purpose and whether some/all should be retained.

Modifications sought by those submitting representations:

OP58: Stationfields

Environment/Wildlife

6, 8, 10, 25, 30, 55, 60, 69, 72, 86, 96, 135, 169, 176, 186: Less development should be built on greenspace. No culling of innocent wildlife. Impact on conservation area needs to be investigated prior to development. Leave land as is.

68: Fields could be developed into local green space or nature park where local wildlife can be preserved.

Transport Issues

6, 10, 25: Infrastructure should be able to cope with the increased traffic. Issues of road safety should be addressed.

30: Move the development north, this would reduce traffic impact.

169: Better to use land to build a train station which will improve access to the city and ease congestion.

29, 33, 86: Leave land as is and reserve it for the train station.

Inadequate Facilities

6, 10, 21, 25 60, 169, 186: Provide extra facilities. Improve facilities.

55, 72, 176: Area is already dense so just look after current residents. Leave land as is

135: An action plan showing accountability for facilities' improvements should be drawn up prior to planning permission.

Landscape

8: Fewer houses should be built on the land.

69, 96: One of Cove's most prized qualities is its natural landscape. Keep it natural.

General

28, 72: Objects to Plan and site should be left as is.

96: Biodiversity and the views of local residents should be the main concern for the Council. Leave the site as is. If not, there are other options including opening up site for recreation, using the site for education since the school is close-by, or build a

small railway station.

LOIRSTON AND COVE

Torry

35: A new section entitled 'Torry' should be introduced.

OP103: Former Torry Nursery School

35, 70: Reserve site for health and social care use. Housing development would remove this option and place burden on the existing Practice's ability to deliver essential medical services. Reference to unmet health needs should be included in Appendix 3.

OP107: East Tullos Gas Holder

Object to Allocation

40: Site should be designated as "white land" or for other higher value uses e.g mixed use, residential, retail.

OP60: Charleston

Business and Industry Use

93: The phasing of OP60 should be brought forward in the new Proposed Plan to period 2017-2026. This should be reflected in the Proposed Plan as follows:

1. The land at Charleston be included in Table 7: Development at Loirston and Cove for 20.5ha of employment land for the period Phase 1:2017 - 2026.
2. The zoning of OP60 be changed from Land Release Policy (LR1) to Business and Industry (B1).
3. OP60 Charleston in the Proposed Plan Action Programme under Masterplan Zone 8: Loirston OP59, OP60, OP61 be amended to reflect the site is allocated to the period 2017 - 2026.

OP62 Nigg Bay Harbour Expansion

137: The extent of the B5 allocation at Nigg Bay should be amended to reflect that shown on the accompanying draft Harbour Revision Order boundary plan.

OP110: Wellington Circle (Former Makro)

57: Opportunity Site designation should be reinforced by reference to the proposal in paragraph 3.28 of the Plan as it clearly addresses an existing deficiency in retail provision. Underlying Business and Industry designation applied on the City Wide Proposals Map should be removed and replaced with designation identifying

Commercial Centres (NC6).

62: No change - support the allocation.

93: OP110 deleted from the Proposed Plan City Wide Proposals Map, Appendix 2 and Action Programme. Reference should be made to the retail opportunity/proposed supermarket being included within OP59 Loirston in both Appendix 2 and the Action Programme.

OP105: Kincorth Academy

41: Consider whether any of the outdoor sports facilities should be retained on site for community use.

Summary of response (including reasons) by planning authority:

OP58: Stationfields

General

This site was first identified (OP8) in the Aberdeen Local Plan 2008 (CD43) and has been carried over from the extant Aberdeen Local Development Plan 2012 (CD42) following favourable consideration at the last Examination under Issue 59 (CD44). The principle of housing on the site is therefore long established. It is well located to benefit from, and support local services such as primary schools, shops and community facilities which are within walking distance. Whilst the site does not count towards the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) housing allowances, it will nevertheless contribute towards maintaining a healthy 5 year housing land supply. The Housing Land Audit 2015 shows completions on site from 2016 onwards (page 41, CD17).

21, 28, 68 72: Housing is a basic human need and it is important that everyone has access to housing of a reasonable quality that is affordable to those with modest incomes. In the case of OP58, development that comes forward on this site would be required to deliver some affordable housing units which would help to build an overall sustainable mixed community. Development in OP58 would be required to comply with Proposed Plan Policy D1 Quality Placemaking by Design. Proposals would be considered against these six essential qualities: distinctive, welcoming, safe and pleasant, easy to move around, adaptable and resource efficient, in order to create sustainable development that enhances the social, economic, environmental and cultural attractiveness of Cove.

96: The SDP sets the requirements for brownfield, greenfield and employment allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. The Proposed Plan has already allocated a significant amount of brownfield land for housing, in line with the SDP. Furthermore, Proposed Plan site OP58 was identified in the Aberdeen Local Plan 2008 (CD43) and part of the site

was included in the Cove Masterplan and Charette Report, which included a participatory process.

186: Any planning application that comes forward for OP58 Stationfields will be subject to standard consultation procedures.

Environment/Wildlife

6, 8, 10, 25, 28, 29, 30, 33, 45, 55, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: Where it is suspected that a Protected Species is present on this particular site, a survey will be recommended as part of any development proposal that is brought forward and it would have to comply with Proposed Plan Policy NE8. In addition to this, all residential development proposals will have to comply with all relevant policies regarding protecting and enhancing the natural environment.

Transport Issues

6,8, 10, 21, 25, 28, 29, 30, 33, 45, 55, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: Residential development at OP58 Stationfields will be required to carry out a Transport Assessment according to Policy T2 Managing the Transport Impact of Development. They would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include any impacts on Coast Road. In addition to this, all residential proposals on this site will have to meet the standard parking requirements found in the Proposed Supplementary Guidance Transport and Accessibility (CD25).

The suggestion that having a train station will ease congestion has been noted. Aberdeen City Council recognises that a train station in Cove would help to alleviate traffic congestion. At present there are no firm proposals for a train station at Cove. However, the North East of Scotland Transport Partnership (Nestrans) have confirmed that further studies are due to be carried out in the next 12-18 months in order to identify opportunities for improving rail opportunities in and around Aberdeen, building on the upgrade which is currently ongoing to enhance the Aberdeen-Inverness line. This study will include consideration of the appropriateness of a new station in Cove and will be aligned with the City Region Deal, which will dictate the timeframes. If a train station proposal was to come forward, it would need to meet the principles of Proposed Plan Policy D2- Landscape, which aims for developments to improve and enhance the setting and visual impact of any development, unify urban form, provide shelter, provide local identity and promote biodiversity.

Inadequate Facilities

6, 8, 10, 21, 25, 28, 29, 30, 33, 45, 60, 68, 69, 72, 86, 96, 135, 169, 176, 186: The Cove Masterplan identified the need to create a Commercial Centre that serves walkable neighbourhoods. This was to be located on OP56 Cove, which is also part of the Masterplan and is currently being developed. OP56 Cove is in close proximity to OP58 Stationfields, and so any created facilities can be used by persons living in the development on both sites. In addition to this, Proposed Plan Policy I1 Infrastructure and Developer Contributions indicates that development must be

accompanied by the infrastructure, services and facilities required to support new or expanded communities and the scale and type of developments proposed. Where development either individually or cumulatively will place additional demands on community facilities or infrastructure that would necessitate new facilities or exacerbate deficiencies in existing provision, the Council will require the developer to meet or contribute to the cost of providing or improving such infrastructure or facilities.

Landscape

8, 28, 68, 69, 96, 186: Any residential development proposal that comes forward would be required to comply with Proposed Plan Policy D2-Landscape. The proposals would need to respect the existing landscape and improve upon it through quality development.

Education

28, 29, 30, 33, 69, 86, 96, 135, 169, 186: Aberdeen City Council's School Roll Forecast (CD32) indicates that Loirston Primary is within capacity and is able to accommodate residential development that will come forward for this site. The School Roll Forecast also indicates that Kincorth Academy, which is the other school in this catchment area, will also be able to accommodate any residential development that comes forward.

Cove Masterplan and Charette Report

69, 147: The Cove Masterplan and Charette Report will need to be updated when the Proposed Plan 2016 is adopted. Moreover, the Masterplan and Charette does not include the whole OP58 site area. Therefore, any update to the Masterplan should include the whole of OP58 to help avoid incremental development that doesn't fit the area's overall design. Any development on the part of this site that is included in the Masterplanning boundary area will be based on the adopted Masterplan and would align with its vision. Any development outwith the Masterplan area will also take into account the existing adopted Masterplan and will work to connect existing public open spaces and natural landscapes.

OP54: Altens East and Doonies

General

35: The representation dealt with the detail of a live planning application (150432), rather than the principle of development on the site, and as such is not considered an issue to be dealt with through the examination of the Proposed Plan. The representation was copied to the Development Management Officer dealing with the planning application which, at the time of writing, remains a pending application.

Supports Allocation

91: Support is welcomed and noted. The creation of a material recycling facility,

refuse derived fuel plant ancillary facilities is a key priority of the Aberdeen City Waste Strategy 2014 - 2025 (RD31). The principle of its allocation was tested at the previous Examination (CD44, Issue 128), albeit the area has since been extended towards the coast road. It remains appropriate to identify the site as a development opportunity for waste facilities within the wider Business and Industry zoning as there has been no significant change in circumstances which would justify an amendment to this designation. At the time of writing, a planning application (150432) for erection of materials recycling facility and refuse derived plant with associated car parking and landscaping is pending determination.

LOIRSTON AND COVE

Torry

35: Aberdeen City Council recognises that Torry is a community with strong architectural and spatial character. The Proposed Plan identifies eight Masterplan Zones in the City containing allocated greenfield sites. The allocated sites in Torry are not greenfield allocations and therefore do not warrant being included as a Masterplan Zone nor being given a new section in the Proposed Plan.

Traffic

35: Aberdeen City Council recognises that air quality problems are predominantly a result of emissions from road vehicles and this is reflected in the Air Quality Management Areas, of which Wellington Road and Market Street are included. The Aberdeen Air Quality Action Plan (CD37) recommends a range of initiatives to address air quality problems. This includes raising awareness of air quality issues, promoting sustainable transport, reducing the need to travel, improving traffic management and transport infrastructure, and consideration of a Low Emission Zone. It is outwith the remit of the Aberdeen Local Development Plan to ban certain vehicles from an area. Proposed Plan Policy T1-Land for Transport identifies land that has been safeguarded for several transport projects that will help to alleviate traffic congestion within the city boundary. In addition, Proposed Plan Policy T2-Managing the Transport Impact of Development requires proposed development to demonstrate that sufficient measures have been taken to minimise any traffic generated.

Torry Academy

35: Torry Academy is not an allocated site in the Proposed Plan.

Walker Road School

35: Aberdeen City Council is not responsible for the listing of buildings. This is the responsibility of Historic Scotland.

East Tullos Industrial Estate

35: East Tullos Industrial Estate is an established business park and has been

zoned in the Proposed Plan for Business and Industry. Aberdeen City Council welcomes planning applications that seek to modernise this business park. These applications would be dealt with in accordance with the Proposed Plan policies.

Consultation

35: Aberdeen City Council undertake consultation with relevant appropriate key agencies and the general public during the Masterplanning and planning application stages when the details of the proposed development have been further investigated.

Housing Capacity

183: The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for housing and employment allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. The Proposed Plan has already allocated a significant amount of land for residential development, in line with the Strategic Development Plan. The life of the Proposed Plan covers the period up to 2026. Although indicative allocations for the period post-2026 are highlighted, this is not a requirement. The South city area has additional non-allocated sites which will also contribute to residential development in this area. These can be found in the Housing Land Audit 2015 (CD17). Comments on residential development capacity have been further dealt with in Issue 2.

OP103: Former Torry Nursery School

35, 70: The National Health Service (NHS) is responsible for assessing whether an area is in need of additional health and social care facilities. It is therefore responsible for submitting a bid for any sites it wishes to be put forward for health and social care uses as part of the Local Development Plan. Moreover, the NHS is a member of the Future Infrastructure Requirements Services (FIRS) Working Group and is content with the allocation of OP103 Former Torry Nursery School for residential development.

OP107: East Tullos Gas Holder

The creation of an Energy from Waste facility is a key priority of the Aberdeen City Waste Strategy 2014 - 2025 (RD31) in support of Scotland's Zero Waste Plan 2010 (CD08). At their meeting on 4 December 2013, the Zero Waste Management Sub Committee considered an Energy from Waste Business Case and Appendix. The Committee resolved to approve the recommendations in the Report and specifically that a site/sites should be nominated for inclusion in the next Local Development Plan for an Energy from Waste Facility. In line with Scottish Planning Policy (CD05) (para 96) the Proposed Plan has identified "opportunities for integrating efficient energy and waste innovations within business environments."

OP107 was subject to a development bid, is partially within Council ownership (recycling centre), and is available for development. The industrial setting makes the site suitable for an Energy from Waste facility in line with Scottish Planning Policy and Proposed Plan policies. It is close to a wide range of users of heat and power.

The site is also close to OP54 (the materials recycling facility and collection depot) and this will minimise the impact of vehicle trips between the two facilities.

35: It is understandable that people can be concerned about waste facilities and one of the advantages of the site is that it is located away from the main residential areas. We agree that such facilities should be located to sites where potential impacts on human health can be minimised. This is likely to be one of the considerations of an Environmental Impact Assessment which would be required as per Proposed Plan Policy R5 Energy from Waste. Modern waste facilities have to be licensed by Scottish Environmental Protection Agency (SEPA) and operate to a very high standard. The Regulations covering this activity place strict limits on emissions and extensive modelling of emissions dispersion is required before a permit can be considered. As a result, waste facilities should not have any more adverse effects than other industrial processes that could be considered suitable on the site. SEPA will consult with the Local Authority, Health Board and other appropriate persons when determining whether to permit a license. Once operational, SEPA will monitor and enforce standards as necessary.

The proposed development will be required to carry out a Transport Assessment according to Proposed Plan Policy T2 Managing the Transport Impact of Development. It would need to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include any impacts on the road network, including Wellington Road.

40: We would reiterate that waste facilities are generally considered acceptable uses on Business and Industrial Land (B1) in line with Scottish Planning Policy (CD05) (paragraph 186) "Suitable sites will include those which have been identified for employment, industry or storage and distribution" and that this land is zoned as such in both the extant Aberdeen Local Development Plan 2012 (CD42) and in the Proposed Plan. Proposed Plan Policy R5 states that "industrial sites with the potential for connection to the electricity grid and with potential users of heat or power are likely to be suitable locations for energy from waste facilities." This accords with Scottish Planning Policy (CD05) (paragraph 183) "Any sites identified specifically for energy from waste facilities should enable links to be made to potential users of renewable heat and energy." There is a good mix of potential users in the area which includes surrounding businesses, residential properties including flatted and high rise, a school which has a swimming pool at Tullos Primary and potentially developments associated with the harbour at Nigg Bay.

Whilst we appreciate there will be costs associated with decommissioning the gas holder site, the Proposed Plan considers the principle of development on the site and whilst viability/land values is a concern for the landowner that in itself does not justify a change in zoning. The site was subject to a development bid and the principle of Energy from Waste has been considered acceptable by the Council. Rezoning to any other land designation would result in any subsequent planning application for the Energy from Waste facility being contrary to the Development Plan in that there are policies in place which state that industrial sites are likely to be the appropriate locations. Furthermore mixed use, residential and retail are not land uses which we would consider to be acceptable in this location which is fundamentally an industrial estate. Part of the site is currently used as a Household Waste Recycling Centre so

is already used for waste management purposes. There are no circumstances in which we would zone "white land" - the Development Plan is intended to guide development to the appropriate locations and "white land" would provide no guidance.

OP104: Craiginches Prison

35: Support is welcomed and noted. The provision of affordable homes helps to relieve Aberdeen of the severe affordability pressures that it faces and it also helps to create sustainable mixed communities. Aberdeen City Council undertake consultation with relevant appropriate key agencies and the general public during the masterplanning and planning application stages when the details of the proposed development will be further investigated.

OP60: Charleston

Business and Industry Use

93: The role of the Strategic Development Plan (SDP) (CD12) is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment" (Circular 6/2013 paragraph 41) (CD10). The SDP (paragraphs 3.15-3.16) sets a clear strategy for development in Aberdeen, which includes housing and employment allowances to be delivered through Local Development Plans. The Proposed Plan has allocated more land for Business and Industrial development up to 2026 than is required by the Strategic Development Plan. Removing OP60 from Phase 2 of the employment land allocations would create a significant departure from the allowances set in Figure 6 of the SDP on page 26 and discussed in more detail in Issue 1. In this context, it would be prudent to retain the current zoning of OP60: Charleston as Land Release Policy and to keep the phasing as it is.

Increased Traffic

111: Aberdeen City Council recognises that the location of development can have a significant impact on the local transport network. The Aberdeen City and Shire Cumulative Transport Appraisal (CTA) (CD18) highlighted the impact new development across the North East would have on transport infrastructure. This resulted in the decision to secure contributions through a Strategic Transport Fund (STF) (Supplementary Guidance to the SDP) (CD19) to fund the delivery of infrastructure. The A956/A90 Corridor is one of the infrastructure projects that will be funded by the STF along with a further crossing over the River Dee. In addition to this, all significant new developments would be required to carry out a detailed transport assessment according to Proposed Plan Policy T2-Managing the Transport Impact of Development. It would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include impacts on Wellington Road.

OP59: Loirston

Increased Traffic

111, 147: See comment above.

General Support

146: Support has been welcomed and noted.

OP61: Calder Park

111: Aberdeen City Council recognises that the location of development can have a significant impact on the local transport network. The Aberdeen City and Shire Cumulative Transport Appraisal (CTA) (CD18) highlighted the impact new development across the North East would have on transport infrastructure. This resulted in the decision to secure contributions through a Strategic Transport Fund (STF) (Supplementary Guidance to the SDP) (CD19) to fund the delivery of infrastructure. The A956/A90 Corridor is one of the infrastructure projects that will be funded by the STF along with a further crossing over the River Dee. In addition to this, all significant new developments would be required to carry out a detailed transport assessment according to Proposed Plan Policy T2-Managing the Transport Impact of Development. It would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include impacts on Wellington Road.

OP64: Former Ness Tip

126: Aberdeen City Council acknowledge that there is a presumption in favour of protecting woodland sites in Scottish Planning Policy (paragraph 201) (CD05). The Proposed Plan also notes that the protection of tree and woodland cover contributes to sustainable development and enhances the services provided by woodland ecosystems. Development on Proposed Plan Site OP64 Former Ness Tip would be required to comply with Proposed Plan Policy NE5 Trees and Woodlands. This Policy has a presumption against activities that result in the loss or damage to trees and woodland that contribute to nature conservation, local amenity or climate change adaptation and mitigation. Development would be required to provide information detailing safeguarding measures for the protection and long term management of the existing trees.

OP62: Nigg Bay

137: The Council strongly welcomes the identification of the new Nigg Bay harbour development within National Planning Framework 3 (CD04) and has, and continues to, work with the harbour board on its delivery. As a Planning Authority the Council nevertheless has a requirement to ensure any development is done in a balanced way to minimise the negative and enhance the positive impacts of such as scheme. While it is noted that the Harbour proposals have developed, the changes are not outwith the OP62 site boundary indicated in the Proposed Plan.

It is noted that the area zoned for harbour use is smaller than the overall OP62 site boundary. The Harbour zoned area reflects the proposals as presented to the

Council at the time of preparing the Proposed Plan and does not prevent suitable development coming forward outwith this zoning but still within the OP62 site boundary. The purpose of this smaller harbour zone footprint was to prevent the loss of Green Belt and Urban Green Space which was not necessary for the delivery of the harbour. The proposal to use land either inside or outside the boundary on a temporary basis during construction is generally acceptable and will be considered as part of the application.

Finally the development of an access track to the breakwater would be acceptable under our current and proposed Green Belt and Urban Green Space Policies NE1 (under paragraph 3) and NE2 (under point 2 essential infrastructure).

Open and Green Space

35: Proposed Plan Policy NE3-Urban Green Space safeguards areas of Urban Green Space from development unless the replacement provision. Moreover, Proposed Plan Policy NE4-Open Space Provision in New Development aims to ensure that functional, useful and publicly desirable open space is provided as part of new development. Development that comes forward on OP62 Nigg Bay will be required to comply with both Policies NE3 and NE4. Aberdeen City Council undertake consultation with relevant appropriate key agencies and the general public during the Masterplanning and planning application stages when the details of the proposed development have been further investigated.

General Support

59: Support has been welcomed and noted.

Woodland

126: Aberdeen City Council recognise that there is a presumption in favour of protecting woodland sites in Scottish Planning Policy (paragraph 201) (CD05). This has also been reiterated in Proposed Plan Policy NE5-Trees and Woodlands. However, in the case of OP62 Nigg Bay, there is no woodland located within the site boundary.

Doonies Farm

147: The boundary of OP62 Nigg Bay will have no effect on Doonies Farm. Moreover, the eastwards extension of OP54 Altens East and Doonies will have no effect over and above what was previously identified in the extant Local Development Plan 2012 (CD42).

Land-Use Change

35: The Harbours Act 1964 (RD04) is outwith the scope of the Local Development Plan Process. To support any development proposals for OP62 Nigg Bay, a Development Framework/Masterplan, Flood Risk Assessment and full Transport Assessment are required. In addition, harbour proposals will be subject to three

separate but closely related consenting regimes:

(i) A Harbour Revision Order to deliver and construct the harbour, under the Harbours Act 1964 which is submitted to Transport Scotland for approval by Scottish Parliament;
(ii) Planning Permission in Principle for ancillary and temporary works related to the construction of the harbour, and further Applications for Matters Specified in Conditions and/or detailed planning permissions under the Town and Country Planning (Scotland) Act 1997 (CD02) as amended; and,
(iii) Marine Licences under the Marine (Scotland) Act 2010 (RD05).

At the time of writing, the Draft Nigg Bay Development Framework has been produced by planning and design consultants Barton Wilmore on behalf of Aberdeen Harbour Board, Scottish Enterprise and Aberdeen City Council. This was prepared following the Council's adopted Aberdeen Masterplanning Process. The Draft Framework will set the context for a series of more detailed Masterplans to come forward in the future for the three sub-areas of Nigg Bay (Harbour), East Tullos and Altens. Furthermore, to encourage further consultation, the Draft Framework was approved for a 6-week public consultation at the Communities, Housing and Infrastructure Committee on 27 August 2015.

OP110: Wellington Circle (Former Makro)

Representations received to the Main Issues Report highlighted limited progress in establishing a retail use on the site identified in the extant Local Development Plan 2012 at OP76 Souter Head Road (Altens Thistle Hotel). In response to representations received to the Main Issues Report the location for a supermarket in the south of the city was for debate. Officers agreed (RD40 - Issue 25) that it was unlikely that the identified site at Souter Head Road would be delivered and that a need for a supermarket to the south of the city remained as its development was highlighted as a retail commitment in the Aberdeen City and Aberdeenshire Retail Study 2013 (CD16).

The Planning Authority's recommendation in the draft Proposed Plan was that there was potential for retail development (serving local needs) to be accommodated within the identified retail centre stated in the Loirston Development Framework to assist in anchoring a village centre for Loirston.

At the meeting of the Communities, Housing and Infrastructure Committee on 28 October 2014 (Item 21), the Council considered the responses to the Main Issues Report and took a view which placed greater weight of development at the site now identified in the Proposed Plan at OP110. They concluded that OP110 was favoured over OP59 and incorporated OP110 as the preferred location for retail to the south of the city in the Proposed Plan which was then subject to a ten week consultation process.

OP110 has a number of advantages over OP59. First the proposal would utilise an existing building and car park. This will be much easier and quicker to deliver. It is essentially a refurbishment of an existing building rather than a new purpose built

facility elsewhere. OP110 is more central to the communities in the south of Aberdeen and more readily accessible to them from Wellington Road and the public transport that uses that road. It is very close to the original proposal at Souter Head Road.

A detailed planning application (140924) for alterations to existing Makro building and partial change of use from Wholesale Retail Warehouse (Class 6) to Supermarket (Class 1) on OP110 was considered at the Planning Development Management Committee meeting on 18 June 2015. The Committee approved the application pending a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997 (CD02) ('Section 75 agreement') to address matters involving local and strategic roads infrastructure contributions.

At the same time a planning application for permission in principle (141754) was received on the site at Loirston (OP59). This was not however, close to the village centre but a separate stand alone site.

Both planning applications were considered at the Planning Development Management Committee meeting on 18 June 2015 (Item 2 and 3). The Committee favoured the site identified in the Proposed Plan at OP110 with the other being refused planning permission in accordance with Officer recommendation.

Following the Member's decision on 18 June 2015 of willingness to approve the application pending Section 75 agreement, the applicant's agent approached the Planning Authority to request amendments to the terms of the planning application submission (140924). The amendment proposed alterations to existing building and part change of use from wholesale retail warehouse (Class 6) to two retail units (Class 1).The Planning Development Management Committee considered the proposed amendment at the 17 September 2015 meeting (Item 9) and agreed the amendment. At the time of writing, the consent had not yet been issued due to pending Section 75 agreement.

Support for Allocation

57, 62, 147: Support is noted.

57: Paragraph 3.28 of the Proposed Plan highlights retail deficiencies identified in the Aberdeen City and Aberdeenshire Retail Study 2013 (CD16). The study took "committed retail opportunity" into account and OP76 (Souter Head Road) provided opportunity in the south of the city. The designation of OP110 has come about due to the recognition of a need to identify a replacement site for the "committed retail opportunity" currently identified at OP76 Souter Head Road in the extant Local Development Plan 2012 (CD42) (which has now been removed in the Proposed Plan). Taking this into account there is no need to specifically mention OP110 in paragraph 3.28 as this specifically relates to new retail requirements arising from new communities.

The site at OP110 is located in the established Wellington Industrial Estate. The overarching policy designation in this area is for Business and Industry. It would not be appropriate to amend the zoning when the allocation identified in Appendix 2 of

the Proposed Plan provides sufficient certainty by specifically stating Class 1 retail as being suitable. A commercial zoning would be inappropriate for a single supermarket site and would be inconsistent with the approach taken with other zonings on the Proposals Map.

Traffic Concerns

111, 147: Aberdeen City Council recognises that the location of development can have a significant impact on the local transport network. The Aberdeen City and Shire Cumulative Transport Appraisal (CTA) (CD18) highlighted the impact new development across the North East would have on transport infrastructure. This resulted in the decision to secure contributions through a Strategic Transport Fund (STF) (CD19) to fund the delivery of infrastructure. The A956/A90 Corridor is one of the infrastructure projects that will be funded by the STF. In addition to this, development on OP110: Wellington Circle (Former Makro) would be required to carry out a transport assessment according to Proposed Plan Policy T2-Managing the Transport Impact of Development. It would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include impacts on Wellington Road.

Object to Allocation/Alternative Site Promoted

93: As the allocation at OP110 discussed above is appropriate and sufficient there is no requirement to consider an alternative site or make modifications sought by respondent. Sufficient provision, to meet local needs, has been identified in the Loirston Development Framework (adopted as Supplementary Guidance to the extant Plan in May 2013). The Framework confirms that locations for local retail (Blocks B3 and B4) have been identified and these "landuses are intended to provide support services for the new residential community and are likely to take the form of an 'express' and/or local supermarket and other retail uses." Planning Permission in Principle (130892) was granted on 1 July 2015.

OP105: Kincorth Academy

41: The Council's intention is to retain the green space and oval running track which currently exist on the site. The swimming pool will not be retained as a new pool will be provided on the site of the new South of the City Academy.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	ALTERNATIVE SITES: LOIRSTON & COVE	14
Development plan reference:	No reference in the Plan	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Ian Livingstone of Ryden LLP on behalf of Stewart Milne Homes and John Lawrie (Aberdeen) Ltd (64)
Mr Malcolm Campbell of Knight Frank LLP on behalf of Hermiston Securities Limited (93)
Mr Gary Purves of Knight Frank on behalf of Mr and Mrs Nicol (143)
Mr Oliver Munden of Persimmon Homes (157)

Provision of the Development Plan to which the issue relates:	Alternative sites in Loirston & Cove

Summary of the representation(s):

34-40 Abbotswell Road

64: Promotes site for residential development. Aberdeen's employment land exceeds Strategic Development Planning Authority targets. Site has good accessibility and rezoning it from business and industrial to residential will make it compatible with surrounding uses i.e. care home, offices and recreational facilities.

Land at Blackhills of Cairnrobin

93: Site should be allocated for Business and Industry as an extension to Aberdeen Gateway and Mains of Cairnrobin Business Parks. Site was previously removed from Local Development Plan because it was within 400 metres of a standoff buffer zone to Blackhills Quarry. Any danger zones will be confined within the quarry's landholdings and a landscaped buffer zone will provide separation between Blackhills Quarry and the site. This site needs to be considered in the context of employment land zonings in both Aberdeen City and Aberdeenshire Local Development Plans. It can help supplement the supply of Class 5 and 6 land and provide an important vehicular connection with the employment land to the south.

Land at Heathvale

143: 5.7 hectares site should be removed from the Green Belt and Green Space Network as it is surrounded by development on all sides. Site is unkempt and contains no special landscape features. It offers no opportunities for public access. It should be considered for residential development. Appropriate buffer will be retained where site adjoins Wellington Road. Land at Charleston Wood is no longer designates as a District Wildlife Site and is of no environmental value. It would however form part of a considered and logical landscape strategy.

Land at Hydrogen Fuelling Station

147: The site of the recently approved Hydrogen Fuelling Station, Hydrogen Generation and Fuel Cells is not mentioned anywhere in the Plan. There is no OP site number for it and it's not on the OP map for the Cove area.

Land at Rigifa Farm

157: The six acre site does not contribute to its current designation of Green Space Network and Green Belt as the recent construction of Aberdeen Gateway Business Park (lies immediately southwest of the site) has eroded the purpose and context of the Green Belt in this particular location. It has potential for residential development of approximately 70 units. The farm buildings within the site also have potential for redevelopment as part of the wider site area. Developable land for this site offers no significant constraints to development and has been amended to include only land lying outwith the 250 metres exclusion zone associated with requirements for blasting at Blackhills Quarry. Other large scale greenfield releases from the current Local Plan have experienced delay in implementation. This development will provide a defensible long term boundary to the green belt in this location and offers opportunity to provide a more robust strategy with regards to the Green Space Network.

Modifications sought by those submitting representations:

34-40 Abbotswell Road

64: Brownfield site should be identified for residential development.

Land at Blackhills of Cairnrobin

93: Site be removed from the Green Belt and identified for Business and Industry. It should be included in Table 7: Development at Loirston and Cove for 5.5 hectares of employment land for the period Phase 1:2017 - 2026 and also included in Appendix 2. It should be identified as an Opportunity Site in the Action Programme.

Land at Heathvale

143: Land at Heathvale, Cove should be removed from the Green Belt and Green Space Network and an alternative land use such as residential development should be considered.

Land at Hydrogen Fuelling Station

147: Make a new OP site for the Hydrogen Fuelling Station.

Land at Rigifa Farm

157: Site at Rigifa Farm should be included as an Opportunity Site suitable for

approximately 70 residential units falling within phase 1: 2017 - 2026.

Summary of response (including reasons) by planning authority:

General Strategy

In preparing the Proposed Plan a Development Options Assessment (CD28, CD30, CD31), Strategic Environmental Assessment (CD27) and Main Issues Report (CD29) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites identified in the Proposed Plan have been carried over from the Aberdeen Local Development Plan 2012 (CD42) which went through a similar process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Action Programme (CD47).

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) sets the requirements for greenfield housing and employment land allowances and these are set out in Figure 1 of the SDP on page 12 and in Schedule 1 on page 42. Under Issue 2 we conclude that the SDP greenfield requirements have been fully met and we are confident that a continuous 5 year housing land supply can be met throughout the lifetime of this LDP. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Plan.

34-40 Abbotswell Road

64: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). There is potential for conflict between new residential development and existing business and industrial uses which are present on the site. The narrow site means that there is insufficient space for a buffer between the proposed residential area and existing business. This means that it will be difficult to maintain an acceptable external amenity for residents. This could lead to complaints which could in turn, prejudice the operation of the existing businesses. In addition the narrow site means it will be difficult to develop high rise development with a sufficient buffer between it and the significant tree belt to the west.

The site is subject to a pending planning application for the demolition of the existing business and industrial land and the erection of a 100 unit flatted residential development inclusive of 24 affordable units, associated infrastructure and landscaping. This application is contrary to the current Development Plan. It is expected the planning application will be presented to committee in December 2015.

Land at Blackhills of Cairnrobin

93: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31) Issues remain with land use conflict between the quarry and the proposed

business use.

Land at Heathvale

143: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report. The site is zoned as Green Belt and Green Space Network. The allocation of housing within this area would not relate well to existing development and has poor links to local facilities.

Land at Hydrogen Fuelling Station

147: A planning application (141552) for the site and development was approved at Development Management Committee on 28 May 2015. The timing of this meant that there was no opportunity to include the site in the Proposed Plan which was agreed earlier in January 2015. However, because the site is subject to an approved planning permission, it is considered unnecessary to identify the site as an opportunity site at this stage.

Land at Rigifa Farm

157: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Plan Site Assessment Report (CD31). The site is zoned as Green Belt with the north west corner as both Green Belt and Green Space Network. The allocation of housing within this area would be isolated within a greenbelt zoning with only the western edge relating well to existing development. A planning permission (130490) was approved in January 2015 extending the operating lifespan of the quarry to 2050. The proposed site would abut the northern edge of the quarry OP site; therefore consideration would have to be given to the potential for a negative impact on the business practice of the quarry due to neighbouring residential use.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	CITY CENTRE DEVELOPMENT GENERAL	15
Development plan reference:	Page 26; Appendix 4	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr James Sinclair (3)
Mr Norman Haggart of Queen Street Church of Scotland (18)
Mr Mike Williams of c/o Scott Hobbs Planning on behalf of Scottish Enterprise (120)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Ms Catherine Thornhill of Savills (UK) on behalf of Hammerson plc (158)
Mr Simon Pallant of Scottish Government Planning and Architecture Division (164)
Mrs Irene Strachan (187)

Provision of the Development Plan to which the issue relates:	City Centre

Summary of the representation(s):

City Centre Masterplan and Delivery Programme

3, 18: Concerns relating to concept developments outlined in the City Centre Masterplan, the materials used and transportation and access impacts

120: Support the City Centre Masterplan and Delivery Programme.

Mix of Uses in the City Centre

136: Paragraph 3.18 should include residential as these uses contribute to the vitality of the centre.

Retail Core and Union Square

158: Support the inclusion of Union Square within the City Centre Retail Core.

Town Centre Strategies

164: There needs to be commitment to progress the development of town centre strategies, as per paragraph 65 of Scottish Planning Policy. We would suggest the inclusion of a 'connection' in the development plan, to allow the spatial elements of the town centre strategies to be developed into Supplementary Guidance as and when they are prepared.

Public Realm City Centre Improvements

187: A number of suggestions are put forward for improving the city centre and the public realm. These include providing a roof top restaurant for His Majestie's

Theatre, greening the Castlegate, emphasising the Salvation Army building, green space should be located in front of St Andrew's Cathedral, provide a skatepark and amphitheatre, Woolmanhill Hospital should be regenerated into housing and possibility and 6 bed mini ward, sorting out the wind tunnelling on Union Street.

Modifications sought by those submitting representations:

City Centre Masterplan and Delivery Programme

3: All decision making on future city centre developments removed from Council administration officials.

120: Amend the Plan to place greater emphasis on identifying and securing funding mechanisms and delivery of essential infrastructure to secure the implementation of the City Centre Masterplan

Town Centre Strategies

164: Amend the Proposed Plan to provide a suitable statement to set out that, following the preparation of town centre health checks, town centre strategies will be prepared to deliver improvements to the town centres, and that Supplementary Guidance will be brought forward to cover the spatial elements of town centre strategies.

Retail Core and Union Square

158: Union Square should be identified as an Opportunity Site.

Summary of response (including reasons) by planning authority:

Town Centre Strategies

164: The long term vision for the City Centre has been progressed through the City Centre Masterplan and Delivery Programme 2015 (CD33). The document was agreed at Full Council on 24 June 2015 (RD67). The City Centre Masterplan and Delivery Programme 2015 outlines four key themes, eight objectives and a number of proposed projects and interventions for the City Centre. Future Masterplans will be worked up to provide detail on specific projects and interventions; these will be feed into future Aberdeen Local Development Plans at the relevant time. Retail Health Checks will continue to be implemented bi-annually to check activity, physical environment, property, accessibility, and community of our retail centres, with the next checks programmed for 2016. The exact nature of the Supplementary Guidance documents which will be derived from the City Centre Masterplan and Delivery Programme 2015 are unknown at this time. The Local Development Plan Team will be heavily involved with the City Centre Masterplan Team to research and deliver the detailed Supplementary Guidance documents when these come forward, and

embed these into future Aberdeen Local Development Plans.

City Centre Masterplan and Delivery Programme

3, 18, 120: The support for the City Centre Masterplan and Delivery Programme 2015 is welcomed.

The objections submitted relate to the City Centre Masterplan and Delivery Programme 2015, which was consulted on just prior to the Proposed Plan, and in which a number of conceptual developments were outlined. It is expected that site specific developments within the City Centre Masterplan and Delivery Programme 2015 will be further worked up by the City Centre Masterplan Team in conjunction with other Council Teams and Departments, and these will then feed into future Aberdeen Local Development Plans. The City Centre Masterplan and Delivery Programme 2015 time frame goes beyond the 10 year scope of the Local Development Plan. Identifying and securing funding mechanisms for the developments outlined in the City Centre Masterplan and Delivery Programme 2015 will be the remit of the City Centre Masterplan Team. Transportation, access to existing facilities and community uses, and materials used would be assessed within a site specific Masterplan and/or planning application.

Delegated powers and the ability for Officers to make decisions, is outlined within Section 56 Local Government (Scotland) Act 1973 (CD01), and Section 43A Town and Country Planning (Scotland) Act 1997, as amended (CD02). The delegated powers given to Officers in Aberdeen City is subject to Committee approval.

Mix of Uses in the City Centre

136: Paragraph 3.18 of the Proposed Plan outlines that the city centre is a place where people choose to live, visit, meet socially and it offers a wide range of good and services. Therefore, the residential nature of the city centre is outlined within the paragraph already. The principle of residential use in the city centre is also supported with the Proposed Harmony of Uses Supplementary Guidance (CD25). Proposed Plan Policy NC1: City Centre Developments – Regional Centre outlines that development within the city centre must contribute towards the delivery of the vision for the City Centre Masterplan and Delivery Programme 2015. This document says that a mix of uses within the city centre will help to achieve the goal of a vibrant city centre. As outlined above, it is expected that a number of site specific Masterplans will be developed providing further detail on the conceptual developments with the City Centre Masterplan and Delivery Programme 2015. Within these will be proposals for residential developments.

Retail Core and Union Square

158: The support for the inclusion of Union Square within the City Centre Retail Core is welcomed.

In 2013 a retail study (CD16) was commissioned by the Aberdeen City and Aberdeenshire Strategic Development Planning Authority, Aberdeen City Council and Aberdeenshire Council to investigate the retail provision and needs of the

region. The study identified a requirement to allocate further 30,000 - 35,000 square metres of retail space in the city centre to 2022. Following consultation on the Main Issues Report (CD29), the Proposed Plan, in paragraph 3.22, identifies four areas in the city centre where retail development would be supported: OP102 Crooked Lane/George Street, OP67 Aberdeen Market, OP96 Upper/Basement Floors 73-149 Union Street and the OP91 Marischal Square development. This paragraph also says that further expansion and improvements to the existing retail stock in the City Centre Retail Core will be encouraged and this could include the main shopping centres at Bon Accord, St Nicholas, Trinity and Union Square. Further detail on this will be addressed through the City Centre Masterplan and Delivery Programme 2015 to ensure flexibility and delivery.

We do not consider it necessary to identify Union Square as an Opportunity Site. The Union Square development sits within the City Centre Retail Core zoning which is the preferred location for major retail development; therefore the principle of retail development in this area is supported and encouraged. Were a planning application to come forward, the scale of development would need to support the wider aims of the Local Development Plan; ensuring there is a resilient, safe, attractive, accessible and well connected city centre. A Proposal of Application Notice (151362) is pending for the site to extend the shopping centre to provide additional mixed use floorspace.

Public Realm City Centre Improvements

187: The Proposed Plan supports the development of quality places which add to the social, economic, environmental and cultural attractiveness of the city, as outlined in paragraph 3.1, Policy D1 and the six qualities of successful placemaking.

A number of concepts for improving the public realm of the city centre are outlined with the City Centre Masterplan and Delivery Programme 2015 (CD33). As outlined above it is expected site specific Masterplans will be brought forward by the City Centre Masterplan and Delivery Programme Team. Conceptual developments outlined within the City Centre Masterplan and Delivery Programme 2015 which are relevant to the representation focus on the Castlegate including the Citadel. A number of public realm developments are also outlined. When the site specific Masterplans/planning applications for the concepts in the City Centre Masterplan and Delivery Programme 2015 are submitted, further public consultation will take place whereby many of these public realm issues can be explored in detail. The NHS is responsible for health care provision and communication regarding services would be better directed towards them.

Air Quality is an issue for Aberdeen City and we exceed both European Union and UK air quality targets for nitrogen oxides and fine particulate matters (CD37). Three Air Quality Management Areas (AQMAs) exist within Aberdeen City, and one of these is in the City Centre (encompassing Union Street, Market Street, Virginia Street, Commerce Street, Guild Street and Bridge Street, and parts of Holburn Street, King Street and Victoria Road). This is outlined in paragraph 3.50 of the Proposed Plan and the Proposed Air Quality Supplementary Guidance (CD25). Policy T4: Air Quality and Supplementary Guidance Air Quality (CD25) state that development proposals which will have a detrimental impact on air quality will not be permitted unless mitigation measures are proposed and agreed. Policy T3:

Sustainable and Active Travel encourages active non-motorised travel which will assist in combating poor air quality.
Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	NEW POLICY	16
Development plan reference:	No reference in Plan	

Body or person(s) submitting a representation raising the issue (reference no.):

Miss Stephaine O'Callaghan of QUOD on behalf of Scotia Gas Networks (SGN) (40)
Mr Ross Anthony of The Theatres Trust (92)
Mr Peter Roberts of Cults, Bieldside & Milltimber Community Council (102)

Provision of the Development Plan to which the issue relates:	New Policies Proposed

Summary of the representation(s):

Gas Holder Site (OP107)

40: Aberdeen Local Development Plan should include a Policy in order to enable strategic direction when planning for the future of Gas Holder Sites.

Tourism, Leisure and Culture

92: The Local Development Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

Infrastructure

102: A Policy should be developed to ensure infrastructure is delivered regardless of whether a development is completed.

Modifications sought by those submitting representations:

Gas Holder Site (OP107)

40: New Policy to be included in the next Local Development Plan Policy: Hazardous Installations. Hazardous installations will be identified in the Strategic Development Plan. The Council will take into account the need to incentivise and fund decommissioning.

Tourism, Leisure and Culture

92: The Local Development Plan should contain a Policy (possibly named Tourism, Leisure and Culture) that specifically aims to protect, support and enhance existing

leisure and cultural facilities from change of use or redevelopment, unless it can be demonstrated that there is no longer a community need for that facility, as well as providing criteria for encouraging new cultural development of all sizes.

Infrastructure

102: New Policy requiring the completion of infrastructure irrespective of the completion of the development.

Summary of response (including reasons) by planning authority:

Gas Holder Site (OP107)

40: The decommissioning of contaminated land is addressed in Proposed Plan Policy R2 Degraded and Contaminated Land. This Policy is framed by The Environment Act 1995 (RD03) which applies the "polluter pays" principle. As highlighted in the supporting text of the Policy, this means that the cost of remediating such land is spread among "polluters, landowners and taxpayers". This policy also notes that PAN 33: Development of Contaminated Land (RD27) must be consulted. The PAN notes that there may be situations where the benefit of the remediation of such sites may "take priority over other policy objectives". As such the planning process already considers the implications of remediation and its impact on the viability of developing such sites and an additional Policy would be of little benefit.

Tourism, Leisure and Culture

92: The Proposed Plan is a land use based planning document and, as such, where development proposals come forward which are culture, tourism or leisure related, or impact on such uses, they will be assessed on their merits and the appropriateness of the development within the context of the area. The importance of these uses is however recognised and this is reflected in several polices in the Plan. The Plan aims to promote the principles of Scottish Planning Policy Para 36 (CD05) including those around Placemaking. It seeks to do this by putting Placemaking at the centre of all development within the city. This is reflected by its inclusion in one of the first Policies within the plan, Policy D1 - Quality Placemaking by Design. A fundamental element of Placemaking, and of this Policy, is the importance of culture to the success of any place or city. Policy D1 does this by emphasising that "Places that are distinctive and designed with a real understanding of context will sustain and enhance the social, economic, environmental and cultural attractiveness of the city." In this way the Council recognise the importance of culture and has imbedded in a policy that applies to all development in the city.

In areas which can be specifically identified as being important to culture, tourism and leisure, this has been included in the relevant polices. For example Proposed Plan Policy NC1 City Centre Development – Regional Centre, emphasises the importance of the city centre as a city wide and regional hub for leisure and retail. It also highlights the need for a sequential approach to the location of such uses to

protect and support such developments in the city centre. Proposed Plan Policy NC9 Beach and Leisure, recognises the importance of the beach as a centre of leisure and seeks to safeguard the area through a policy and a land use zoning. At a corporate level Aberdeen City Council's administration have set out their Vision for the city in their vision document a Aberdeen – the Smarter City, 2012-2017(RD32), which includes making art and culture a priority within the city. One of the many results of this can be seen in the £30 million refurbishment of the Aberdeen Art Gallery. In light of the above it is clear that both the Council as a corporate body and the planning department through the Proposed Plan and the planning process already consider this issue in some detail. The inclusion of an additional Policy is not considered necessary.

Infrastructure

102: The importance of infrastructure is highlighted throughout Scottish Planning Policy Para 15, with a requirement for Local Development Plans to allocate sites to maximise the benefits which can be achieved from existing and new infrastructure provisions. National Planning Framework 3 (NPF3) (CD04) also highlights this by showing the Scottish Governments considerable commitment to new infrastructure in the form of the new harbour at Nigg Bay and proposed rail upgrades. The availability of infrastructure was amongst the criteria examined in the Development Options Site Selection process (CD28) at Pre-Main Issues Report stage in 2013. The Proposed Plan, and the supporting Proposed Action Programme (CD47), also identify infrastructure requirement as set out in Circular 06/2013: Development Plans (CD10). Appendix 3 of the Plan sets out the expected major infrastructure requirements in each of the Proposed Masterplan Zones to highlight to developers and the community what is, or will be expected, from each development.

These infrastructural requirements will be secured through the Masterplanning and planning application process. However any infrastructure secured through the planning process must be done on the basis of the scale of development proposed and its impact. The Scottish Government sets out the circumstances in which planning obligations can be used in Circular 03/2012: Planning Obligations and Good Neighbour Agreements (CD11). This document states that any planning obligation must be related to the development and proportionate in scale. The Circular also sets out a series of policy tests, these include that any obligation must fairly and reasonable relate to the scale of the development and "be reasonable in all other respects". All of this is done to ensure that any obligation required through the planning process is directly related to the scale of impact of the development as it is the development that must fund or part fund such obligations. If a development is not completed or does not reach a level required by the planning permission or legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended (CD02) for the delivery of a piece infrastructure, it would not be reasonable to require its delivery. It would therefore be unreasonable and contrary to Circular 03/2012 to form a Policy which required the delivery of infrastructure to satisfy a deficit not caused by the development. However if the development were to continue at a later date the same obligations would apply and the developer would have to complete any infrastructure requirement attached to the original planning permission.

Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	ALLOCATED SITES: CITY CENTRE AND URBAN	17
Development plan reference:	Page 87-90, Proposals Map, Policy R4, Appendix 2, Appendix 5, Appendix 6	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Heri Fernandes (2)
Mrs Mackay of Pootung Cottage (17)
Mr David Fryer of Torry Community Council on behalf of Torry Community Council (35)
Mr Rab Dickson of the North East of Scotland Transport Partnership (59)
Miss Diane Morrison of St Mark's Church (67)
Mr Alasdair Morrison of GVA James Barr on behalf of F&C REIT Asset Management (87)
Mr Abdul Latif of The New Aberdeen Mosque and Community Centre Project (116),
Mrs Marianne Evans of c/o MAC Ltd on behalf of Charlie House Appeal (Registered Charity SC042643) (121)
Miss Samantha Jackson of CBRE Ltd on behalf of John Lewis (139)
Mrs Theresa Hunt of Burness Paull LLP on behalf of Aberdeen Football Club (146)
Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148)
Mr Colin Fraser of Park Home Estates (170)
Mr George Murray (180)
Mrs Susie Murray (181)
Mrs Irene Strachan (187)

Provision of the Development Plan to which the issue relates:	Opportunity Sites within the existing built environment

Summary of the representation(s):

OP36 Charlie House

121, 148: Supports the identification of OP36 for the delivery of Charlie House as a respite and care facility to support children with complex disabilities and life limiting illnesses. Aberdeen City Council have failed to remove the Urban Green Space zoning when drafting the Proposals Map. Request the Urban Green Space zoning is removed from this site on the Proposals Map on the basis the zoning conflicts with the Opportunity Site zoning. Support given to the retention of the site boundary as contained in the Development Bid, in order to accommodate infrastructure works and landscaping.

OP66 Manor Walk

170: Mobile Home Park Site should be allocated for any type of housing, not just social housing. Mixed Use would be a suitable classification as it also includes residential use.

OP77 Cornhill Hospital

180, 181: Too many trees are to be destroyed in and around the area. This will have a negative impact on privacy and wildlife, including nesting birds. (**Note** - A petition was submitted for this site. The date on the petition is April 2014; 11 months prior to the consultation on the Local Development Plan. The petition relates to the planning application for the site (130381), not the Proposed Plan.)

OP81 Denburn and Woolmanhill

67, 87, 148, 187: Many of the members of St Mark's church use the car parking spaces in the Denburn Car Park, not only on Sundays but during the week to attend the activities which take place in the church and hall. A large part of our revenue comes from hall lets from outside organisations, and good car parking facilities are vital. Support the identification of OP81 for a Mixed Use development. Woolmanhill Hospital should be regenerated into housing. Respondent queries whether it could have a 6 bed mini ward to prepare patients leaving hospital for return to their homes - allowing relatives and friends to visit and ease transition from hospital to home.

OP85 King Street/Beach Esplanade

116: Entry for OP85 includes the sentence: "until proposals for these uses are progressed, or if a decision is made not to pursue them, the existing open space use will be protected by NE3 Urban Green Space." The middle part of this sentence ("or if a decision is made not to pursue them") is unhelpful to the community as there is no question of the development not occurring.

OP87 Pittodrie Park

146: Aberdeen Football Club welcomes the allocation of OP87 for a proposed residential development. Planning Permission in Principle has been granted and the redevelopment of Pittrodie stadium is linked to the construction of a new stadium on site OP59.

OP97 Victoria Road Primary School

35: This site should be recognised as within Torry, and not the City Centre. A new section specific to Torry should be created within the Plan. The Community Council affirm their commitment to the retention of granite buildings, and this building should be retained for conversion to social needs-led housing, including key workers.

OP99 The Waterfront, Torry

17, 35: Too many houses/flats are proposed This will have a negative impact as there is nowhere to park and the streets are already narrow (especially St Fitticks Road), the pavements do not exist. Why close the school and then build more houses? This site should be recognised as within Torry, and not the City Centre. A new section specific to Torry should be created within the Plan.

OP102 George Street/Crooked Lane

2, 139: Comments in Support: We would be supportive of new retail development on this site where it enhances the public realm and attractiveness of this part of the city centre. John Lewis considers that the current area would benefit from improvements and this development could provide the catalyst for achieving this and enhanced links into the John Lewis store.

Comments Against: There are already two large malls located in the City Centre. Union Street is already in a sorry state due to shops moving from the high street into the malls. The small businesses in the city centre are already struggling due to the downturn in the economy, and opening/extending malls will add to their difficulties. A resident of St Andrews Street, and is not prepared to sell up and move out to make way for this development. The allocation is leading to uncertainties and will lead to residents finding it difficult to sell their houses.

Modifications sought by those submitting representations:

OP36 Charlie House

121, 148: Remove Urban Green Space zoning from the Proposals Map at OP36.

OP66 Manor Walk

170: Change of classification from Social Housing to Mixed Use.

OP77 Cornhill Hospital

180: Keep the trees.

OP81 Denburn and Woolmanhill

67, 148: Clarification on what car parking facilities will be available and urge that there is not a reduction in the number of spaces available.

OP85 King Street/Beach Esplanade

116: Change the entry for OP85 so it reads: "site identified by Council resolution for a Mosque, community facilities and open space. Until proposals for these issues are progressed or finalised, the existing open space will be protected by Policy NE3 Urban Green Space."

OP87 Pittodrie Park

146: The extant planning permission should be noted in the description of OP87 on page 89.

OP97 Victoria Road Primary School

35: This site should be recognised as within Torry, and not the City Centre. A new section specific to Torry should be created within the Plan. The Community Council affirm their commitment to the retention of granite buildings, and this building should be retained for conversion to social needs-led housing, including key workers.

OP99 The Waterfront, Torry

17, 35: Fewer flats/houses. Space is required for children to play / hang out. Make St. Fitticks Road broader. A shop in the area would be an advantage Clean the streets and remove the recycling more regularly, especially where Abby Road meets St. Fitticks Street. A new section specific to Torry should be created within the Plan.

OP102 George Street/Crooked Lane

2: Abandon the proposals.

Summary of response (including reasons) by planning authority:

OP36 Charlie House

121, 148: The site was previously considered by Reporters during the Examination of the extant Local Development Plan 2012 (Issue 81) (CD42) when a proposal for residential development of circa 40 dwellings was considered unsuitable by both Aberdeen City Council and the Reporter. The current proposal for the site is the development of a specialist children's respite and care facility. Support for the identification of the site as an Opportunity Site is noted. The decision to retain the site as Urban Green Space has been made intentionally and is not a mapping error. The site is still considered Urban Green Space and any subsequent planning application for this site would need to be assessed against Proposed Plan Policy NE3 – Urban Green Space. Policy NE3 states that permission will not be granted to redevelop Urban Green Space for any use other than recreation or sport, however does make provision for exceptions to this general rule so long as an equivalent and equally convenient and accessible area for public space is laid out and made available in the locality by the applicant for Urban Green Space purposes. Other criteria which any proposal must also meet are also noted in the Policy. Development of this site for the use proposed has been considered acceptable by Officers in principle given the proximity of the site to Woodend Hospital, the proposed location of built development away from areas at risk of flooding, and the intention to only build upon a small proportion of the site area, with the remaining site area developed as sensory and other interactive gardens which would enhance both the landscape character and quality of the Urban Green Space at this location.

OP66 Manor Walk

170: This allocation has been carried forward from the extant Aberdeen Local Development Plan 2012 (CD42) where it is listed as OP21. The site zoning for the

Mobile Home Park is 'Residential Areas (H1)' which is still considered appropriate given that the site sits within an established residential area. It is neither considered necessary nor suitable to amend the site zoning to Mixed Use as the respondent suggests. Proposals for non-residential use within this area would be considered against Proposed Plan Policy H1.

OP77 Cornhill Hospital

180, 181: The allocation is subject to a Development Brief which is Supplementary Guidance to the extant Aberdeen Local Development Plan 2012 (CD42). An application for Planning Permission in Principle for Demolition of former Hospital Buildings and Proposed Residential Development of 323 units with associated car parking, open space and infrastructure was submitted in March 2013 (130381). At its meeting of 12th February 2015, the City Council's Planning Development Management Committee agreed a willingness to approve the Planning Permission in Principle application, subject to the conclusion of a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended. Negotiations on this legal agreement are ongoing.

During the determination of this application for Planning Permission in Principle an Arboricultural Impact Plan was submitted by the applicant and was assessed and considered acceptable by Aberdeen City Council. The Committee Report (RD76) for the application notes that: "A total of 207 trees were identified in the (tree) survey, with 17 trees identified as category-U, meaning that they are not considered to be suitable for retention. Of the 190 trees surveyed as 'appearing sound and healthy', 2 are category-A, 49 category-B and 149 category-C. A total of 91 trees are to be felled to allow the proposed development. Of those 101 trees, none are category-A, 14 are category-B and 77 are category-C. Whilst it is recognised that a significant number of trees would be removed for facilitate the proposed development, it is noted both that a degree of tree loss on this site was foreseen in order to deliver the level of development envisaged by the Cornhill Development Brief and that the trees to be removed are predominantly of Category-C quality. Replacement tree planting, at a minimum rate of 2 new specimens for every tree to be removed, is recommended in order to ensure that the site maintains its landscape character and the character of the Conservation Area is not adversely affected. The applicants have submitted proposals for replacement planting, however a fully detailed scheme will be required, incorporating an Arboricultural Impact Assessment in order to further establish the impact on retained trees and make recommendations accordingly." This requirement for a detailed scheme of planting is included as a Condition to the proposed consent (Condition 12). An associated application for Conservation Area Consent was submitted at the same time (130382) and was approved on 21 July 2015.

OP81 Denburn and Woolmanhill

67, 87, 148, 187: Support for the identification of the site as Mixed Use development opportunity is noted. At the current moment there is no planning application for the site. Therefore, specific questions regarding the design of the site, including proposed car parking provision, are unable to be answered at this time. There will be, in due course, more opportunities for the public to comment on this site when a

planning application is lodged. At the moment all comments regarding layout and design of the proposed development have been noted. The Council approved the City Centre Masterplan and Delivery Programme 2015 (CD33) on 24 June 2015 and Aberdeen City Council is currently working on how to best resource and deliver the range of projects that come under the City Centre Masterplan. The Masterplan accepts that a City Centre Car Parking Strategy is needed in order to: maximise the offering of Park and Ride sites to reduce the overall number of vehicles entering the city centre; maximise current off-street parking available in the city centre; and, increase membership to the Aberdeen Car Club. The Masterplan and Delivery Programme recognises that the Denburn car park is very important to a number of residential and non-residential uses in the area. Therefore any redevelopment that may take place in the Denburn / Woolmanhill area will need to take into consideration car parking provision and recommendations from the intended Car Parking Strategy.

OP85 King Street/Beach Esplanade

116: This allocation has been carried forward from the extant Aberdeen Local Development Plan 2012 (CD42) where it is listed as OP107. The wording which is included within the Proposed Plan is consistent with the wording in the extant Plan. It is considered that there is no need to change the wording as per the suggested modification as the text as currently drafted allows the Council the comfort that the Urban Green Space designation will be protected should proposals for the site not take place. The Respondent's commitment to the delivery of the project is noted.

OP87 Pittodrie Park

146: Support for the continued allocation of Proposed Plan Site OP87 for residential development is noted. The proposed modification to Appendix 2 is discussed separately under Issue 40.

OP97 Victoria Road Primary School

35: This allocation has been carried forward from the extant Aberdeen Local Development Plan 2012 (CD42). It should be noted that the Aberdeen City and Shire Strategic Development Plan 2014 (CD12) requires 7,500 homes on brownfield sites up to 2026, and residential development on this site will assist in meeting this requirement. The Proposed Plan continues to identify this site as a brownfield site and notes its suitability for sensitive residential redevelopment. This would not preclude the development of the site for social housing or key worker accommodation. With regards the potential demolition of this building, the Proposed Plan does not suggest that demolition of the existing building on site would be necessary for development, and indeed Proposed Plan Policy D5 – Our Granite Heritage notes that the Council seeks the retention and appropriate re-use, conversion and adaption of all granite features, structures and buildings.

It should however be noted that the building in question has not been listed for its architectural or historic interest, and the site does not lie within a Conservation Area. Demolition of the buildings on site could be progressed under Part 23, Class 70 of The Town and Country Planning (General Permitted Development) (Scotland) Order

1992. The Reporter should also note that an application for detailed planning permission to demolish the existing Victoria Road Primary School and subsequently erect 62 residential units with associated open space, parking and infrastructure was validated on 03 August 2015 is currently pending consideration by Aberdeen City Council (151260). With regards the Respondent's suggestion that a new section specific to Torry should be included in the Local Development Plan, Aberdeen City Council recognises that Torry is a community with strong architectural and spatial character. The Proposed Plan identifies eight Masterplan Zones in the City containing allocated greenfield sites. The allocated sites in Torry are not greenfield allocations and therefore do not warrant being included as a Masterplan Zone nor being given a new section in the Proposed Plan.

OP99 The Waterfront, Torry

17, 35: This allocation has been carried forward from the extant Aberdeen Local Development Plan (2012) (CD42) where it was listed as OP129 and was previously considered by Reporters during the Examination of this Plan (CD44, Issue 79) where the Reporters considered the Council's approach to the site as reasonable. The site is covered by the Old Torry Planning Study 2002 and this document would be considered in any future applications for planning permission. The Study is not however Supplementary Guidance to the extant Local Development Plan 2012. A proportion of the site has planning permission / has been developed although a proportion remains without permission, hence the continued identification of this site as an Opportunity Site in the Proposed Plan. As future applications for planning permission come forward within this site there will be further opportunities for the public to comment on detailed proposals. With regards the concerns regarding traffic and parking, these points are noted and a detailed assessment of any future proposals for the site would include consideration of the Proposed Supplementary Guidance on Transport and Accessibility (CD25) as well as Proposed Plan Policy H2 Mixed Use Areas.

The respondent's suggestion that spaces for children to play / hang out is noted, and any future proposals for residential development would require to demonstrate how they would meet the terms of Proposed Plan Policy NE4 – Open Space Provision in New Development. With regards to the question over the decision to close Victoria Road School, at the time this decision was taken in 2008, the available data on School Roll Forecasts showed that the school would remain below 40% occupancy for the following 8 years. If the school had remained open then it would have remained under occupancy, making it inefficient to run, which would have been difficult to justify.

With regards the respondent's suggestion that a shop in the area would be an advantage, the Mixed Use zoning would not restrict a retail proposal so long as the scale were to be considered acceptable in the context of Proposed Plan Policy NC4 – Sequential Approach and Impact and Proposed Plan Policy NC5 – Out of Centre Proposals. Points regarding street cleaning and uplift of recycling are not planning matters. With regards the respondent's suggestion that a new section specific to Torry should be included in the Local Development Plan, Aberdeen City Council recognises that Torry is a community with strong architectural and spatial character. The Proposed Plan identifies eight Masterplan Zones in the City containing allocated

greenfield sites. The allocated sites in Torry are not greenfield allocations and therefore do not warrant being included as a Masterplan Zone nor being given a new section in the Proposed Plan.

OP102 George Street/Crooked Lane

2, 139: Response to Comments in Support: The respondent's comments in support of the proposed allocation are duly noted.

Response to Comments Against: In 2013 a retail study (CD16) was commissioned in 2013 by the Aberdeen City and Aberdeenshire Strategic Development Planning Authority, Aberdeen City Council, Aberdeenshire Council to investigate the retail take and shortcomings of the region. The study identified a requirement to allocate further 30,000 - 35,000 square metres of retail space in the city centre to 2022. This potential is driven by a combination of expenditure growth per capita and large population increases within the catchment area served by the city centre. Additional floorspace will also help to prevent expenditure leakage and maintain the city centre as the primary retail area of the North East. Following consultation on the Main Issues Report in 2014 (CD29), the Proposed Plan, in paragraph 3.22, identifies four areas in the city centre where retail development would be supported; Crooked Lane/George Street, Aberdeen Market, Upper/Basement Floors 73-149 Union Street and the Marischal Square development. With regards the respondent's comments on the inclusion of private property within the Opportunity Site boundary, this point is noted, however land ownership is not a planning matter.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY D1, D2 & D3: DESIGN	18
Development plan reference:	Page 17-23	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Ken Hutcheson (9)
Mr William Sell of Craigiebuckler and Seafield Community Council (66)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr John Findlay of Ryden LLP on behalf of Dandara LLP (90)
Ms Lavina C. Massie on behalf of Culter Community Council (98)
Mr George Wood of Old Aberdeen Community Council (100)
Mr Peter Roberts of Cults, Bieldside & Milltimber Community Council (102)
Mr Abdul Latif of The New Aberdeen Mosque and Community Centre Project (116)
Mr Anthony Aiken of Colliers International on behalf of MacTaggart and Mickel Homes (123)
Clare Pritchett of Scottish Environment Protection Agency (124)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148)
Miss Jennifer Woods of NLP Planning on behalf of British Airways (153)
Ms Meabhann Crowe of Colliers on behalf of AA Webster and Sons (162)
Ms Meabhann Crowe of Colliers on behalf of MacTaggart and Mickel Homes and Mr Fabrizio Necchi (163)
Mr Ronald Leith on behalf of Old Aberdeen Heritage Society (179)

Provision of the Development Plan to which the issue relates:	To ensure the delivery of well designed, sustainable places that are informed by the surrounding environment and make a positive contribution to it.

Summary of the representation(s):

General

9: Welcome quality architecture and contemporary design.

Policy D1: Placemaking by Design

Support the policy 98, 116, 123, 124, 136, 162, 163

<u>Design Strategy Requirement and Supporting text</u>

85: Object to the requirement to supply a Design Strategy. This will create confusion where a Design and Access Statement is required and is an additional burden to the development industry.

Update the Reference to the Supplementary Guidance Appendix.

85: It is not clear if the criteria set out under paragraph 3.5 are provided as Supplementary Guidance or part of the text pertaining to the Policy. Further confusion arises through reference to quality placemaking in Policy D1 but that reference changes to successful placemaking in Section 3.5. The qualities are the same, but a consistent description would be helpful.

136: Concern that paragraph 3.3 suggest some developments will not be of a scale to contribute to effective placemaking.

Define Placemaking

100: Define 'Placemaking'. Important buildings of any age, together with conservation areas, listed buildings and the context of these buildings must be preserved and enhanced.

Overlap between Policies

123, 162, 163: There is overlap between this and D2: landscape. Would welcome further information on the Aberdeen City and Shire Design Review Panel.

Additional Text

124: Support the promotion of resource efficient development

Incorrect Appendices

85: The appendices are incorrect

Policy D2: Landscape

Support for the Policy: 98, 102, 116, 123 116

116: We have used these principles in designing the New Aberdeen Mosque and Community Centre

Incorrect Appendices

102: The text in Policy D2 refers to Technical Guidance Notes in Appendix 6. The reference is incorrect, it should be Appendix 5.

Expansion of the Policy

123, 162, 163: Welcome the inclusion of the sentence, “create new landscapes where none exist and where there are few existing features”. The employment of robust, sensitive and strong landscape framework can overcome any concerns regarding allocations of sites. It requires to be expanded as a means by which other

aspirations and policy provisions can be met, e.g. Green Space Networks.

162: Land at Derbeth will be developed inline with the policy

163: Land at Bucksburn will be developed inline with this policy.

Additional Text

124: Additional text required. See the modification section.

Policy D3: Big Buildings

Support for the Policy: 98, 153

Historic Precedent

66: There is a poor record of appropriately allocated big buildings, such as Marischal Square and the West End of Union Street. Tall buildings in the city centre and surrounding streets should be refused.

Policy content

90: Policy should provide more flexibility on the location rather than restricting to the city centre and its immediate periphery. There should be clearer definition of "Big Buildings". There are successful buildings outwith the city centre e.g. Aberdeen University's library buildings, Robert Gordon's University buildings and Dandara's development at Oakhill.

136: Have concerns about the Policy. There should be text regarding the proliferation of large buildings that are uninteresting and overpower our existing heritage. Proper consideration should be given to the density of these, comparing the new building with the adjacent and surrounding area.

148: Policy is too prescriptive and prevents the provision of big buildings in locations outwith the City Centre. There are a number of locations where big buildings are appropriate outwith the City Centre, for example, Aberdeen Royal Infirmary. Big buildings should be determined on context, design and materials.

153: Supports clarification that this Policy does not apply to employment land and industrial areas. Support the need for Big Buildings to comply with Civil Aviation Authority requirements. It would be helpful if this requirement was also reflected in Policy.

179: Concerns regarding the Policy. There is no reference to the impact big buildings would have on the character of conservation area. The Big Buildings Policy is inadequate, in that it does not place at the heart of its concerns the imperative to protect the setting of buildings, streetscapes and views in the City's conservation areas. Historic Scotland in their response to the Draft Conservation Area Character Appraisal for Old Aberdeen suggested a Tall Buildings Strategy relating to extremely

large buildings and the threat of the visual impact new development/tall building would have on the setting of the core of Old Aberdeen.

Incorrect Appendices/Drafting Error

90: The references in the final paragraph of the policy do not relate to big buildings and the opening sentence on page 23 requires clarification.

Modifications sought by those submitting representations:

Policy D1: Quality Placemkaing by Design

Design Strategy Requirement and Supporting Text

85: The requirement to provide a Design Strategy should be removed from the Policy. Failing that, greater clarity must be provided on the nature and scale of developments that will be required to provide a Design Strategy.

The references to the various Appendices should be amended to refer to the correct appendices.

136: 'Vision' should be included as a key attribute for good placemaking.

Overlap between Policies

123, 162, 163: Acknowledge the overlap with Policy D2 in the preamble to Policy D1 Provide further information within the policy text or associated Supplementary Guidance regarding the Design Review Panel.

Additional Text

124: Request the text in the resource efficient section of the six criteria Appendix is modified to read: Maximises efficiency of the use of resources through natural or technological means such as low or zero carbon energy-generating technologies, solar orientation and shelter, water saving measures including water capture and reuse, "connection to mains drainage, avoidance of" carbon rich soils, "incorporation of" SUDS and "blue"/green infrastructure

Policy D2: Landscape

Expansion of the Policy

123, 162, 163: The Policy text should be expanded /amended to provide greater emphasis on the ability of a robust landscape framework to address policy considerations and significantly assist in meeting the provisions of Policy D1.

Additional Text

124: Add the words water features, so the policy reads as below: Be informed by the existing landscape character, topography and existing features to sustain local diversity and distinctiveness, including natural and built features such as "water features", existing boundary walls, hedges, copses and other features of interest.

Policy D3: Big Buildings

Policy content

179: This guidance needs to be re-written to take account of all the comments made, and incorporate effective policy to protect conservation areas from the detrimental impact of big buildings on their setting.

Incorrect Appendices/Drafting Errors

90: The references in the final paragraph of the policy do not relate to big buildings and the opening sentence on page 23 requires clarification.

Summary of response (including reasons) by planning authority:

General

9: We welcome support of the design policies and the ethos of creating quality places. Quality placemaking is at the core the planning system as is outlined through Scottish Planning Policy (CD05), Designing Streets (CD06) and Creating Places: A Policy Statement for Architecture and Place in Scotland (CD07).

Policy D1: Quality Placemaking by Design

Support the Policy

98, 116, 123, 124, 136 , 162, 163: We welcome the support for the Policy

Supporting Text

136: Proposed Plan Paragraph 3.3 states “not all development will be a scale to make a significant placemaking impact, however all good design and details adds to the attractiveness of the built and natural environment and careful consideration is critical. All developments, from window replacements to large developments, represent an opportunity to add to the rich placemaking legacy of our built environment”. Not all developments will be of the scale to have a significant impact on Placemaking, however, as is stated in paragraph 3.5, “all development will be expected to contribute towards creating successful place”. An application to replace a single window may not in itself have a significant impact on Placemaking, and it is unlikely it will be able to fulfil the criteria of ‘Easy to get to/move to’, but the application is still required to be assessed on the principles of Policy D1, and other

relevant policy and Supplementary Guidance. The design, detail, materials and proportions to name but a few characterises will have to be assessed and although the application may not have been able to fulfil the Six Qualities of Successful Placemaking is still adds to the rich placemaking legacy of Aberdeen's built environment.

The Six Qualities for Successful Placemaking are based on and expand the Six Qualities of Successful Place as outlined in Creating Places (CD07) and on page 13-14 of SPP (CD05). The addition of 'Vision' to the list is unquantifiable. The vision of the overarching policy D1 is to create quality Placemaking by achieving the criteria of successful Placemaking. The Six Qualities of Successful Placemaking have tangible criteria, as have been defined in national documents.

85: There is no requirement to retitle the criteria on page 19 of the Proposed Plan from 'Criteria: Six Qualities of Successful Placemaking' to 'Criteria: Six Qualities of Quality Placemaking'. The Six Qualities of Successful Placemaking are based on the Creating Places document and the six qualities of successful places outlined within these. As is stated in the document quality places are successful places. Therefore, quality Placemaking is dependent on achieving the Six Qualities of Successful Placemaking, which in turn will create development that sustains and enhances the social, economic, environmental and cultural attractiveness of Aberdeen. The location of the criteria on pages 19-20, next to the text regarding the Proposed associated Supplementary Guidance documents rather than the policy does raise confusion and could be moved through drafting/editing of the Plan and is not an issue for Examination.

<u>Design Strategy Requirement</u>

85: As is outlined in SPP, paragraph 19 (CD05), planning should take every opportunity to create high quality places by taking a design-led approach. This design led approach should be applied at all levels from National Planning Framework 3 to individual building level.

Design and Access Statements are only required for National and Major Developments, or Local Developments within specific parameters/variables, as is outlined in the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2008 (RD10) and Circular 3/2013: Development Management Procedures (RD24). The provision of a Design Strategy will provide a robust method of increasing the opportunity to create high quality places and to ensure this is applied to all levels. The provision of a Design Strategy alongside an application need not be onerous.

<u>Define Placemaking</u>

100: A definition of Placemaking can be found within paragraph 36 of SPP, "Placemaking is a creative, collaborative process that includes design, development, renewal or regeneration of our urban or rural built environments. The outcome should be sustainable, well-designed places and homes which meet people's need"'. The design policies support the creation, and continuation of well considered places, which contribute towards Placemaking and successful places. As is outlined in

Creating Places quality places are successful places.

The Six Qualities of Successful Placemaking on page 19-20 of the Proposed Plan builds on the Six Qualities of Successful Place on page 13-14 of SPP. This says that consideration should be given to the context of a development. Proposed Plan Policies D4: Historic Environment and D5: Our Granite Heritage provide further protection to preserve and enhance Aberdeen's features.

Overlap Between Policies

123, 162, 163: Proposed Plan Policy D1 provides the overarching policy for all development to ensure there is quality of placemaking by design, which includes consideration of a number of different issues including landscape, as outlined in the Distinctive section of the Six Qualities of Successful Placemaking on page 19 of the Proposed Plan. This Policy will be used in conjunction with many other policies to ensure there is a quality Placemaking approach to delivering new development. There may be further crossover with other policies such as sustainable transport, low and zero carbon technology and energy efficiency, flooding and drainage to name but a few. Within the Local Development Plan there will many crossovers between numerous policies depending on the application which is being assessed. It would be unreasonable to highlight links to the landscape crossover as this will be detrimental to other areas where there is policy crossover, and may not be relevant to every application assessed. The Six Qualities of Successful Placemaking outline a number of significant considerations which need to be addressed when creating a development, again some of these will not be relevant to every application.

The Aberdeen City and Shire Review Panel (RD28) is an existing Supplementary Guidance document to the extant Aberdeen Local Development Plan 2012. We intend to adopt this document as a Technical Advice Note to the Proposed Plan further to its adoption.

Additional Text

124: Part of the modification sought by the respondent is reasonable. Within the Glossary of SPP, page 72 (CD05) green infrastructure is defines as such , 'includes the 'green' and 'blue' (water environment) features of the natural and built environments that can provide benefits without being connected'. If the Reporter is so minded the sentence (under the section 'resource efficient' on page 20 of the Proposed Plan) could be amended to state the following:

'Maximises efficiency of the use of resources through natural or technological means such as low or zero carbon energy-generating technologies, solar orientation and shelter, water saving measures including water capture and reuse, "connection to mains drainage, avoidance of" carbon rich soils, "incorporation of" SUDS and green infrastructure'

Incorrect Appendices

85: The reference to the Appendices is a drafting error and has been corrected by

the Planning Authority as a Non-Notifiable Modification (CD26).

Policy D2: Landscape

Support for the Policy

98, 102, 116, 123: We welcome the support for the policy.

116: Please see Issue 17.

Incorrect Appendices

102: The reference to the Appendices is a drafting error and has been corrected by the Planning Authority as a Non-Notifiable Modification (CD26).

Expansion of Policy

123, 162, 163: The expansion of the Policy to meet the provision of other policies and aspirations is not reasonable. Each policy has a distinct focus. Proposed Plan Policy D2 in principle requires development to be informed by, and improve and enhance the setting and visual impact of developments. Proposed Plan Policy NE1 protects areas identified for their biodiversity, habitat and natural heritage value from development. Policy D2 also notes in bullet point 1 'development will be informed by the existing landscape…' and bullet point 2 'development will conserve, enhance, or restore existing landscape features and should incorporate them onto a spatial landscape design hierarchy that provides structure to the site layout'. Policy NE1 states, 'Proposals for development that are likely to destroy or erode the character and/or function of the Green Space Network will not be permitted'.

Bullet point 3 of Policy D2 does not override bullet points 1 and 2 of Policy D2 or Policy NE2. Strong landscape frameworks can be used to mitigate negative impacts of development. Yet this has to be read in the wider policy context. There is no reasonable argument to expand the text within bullet point 3 of the D2 policy to highlight the mitigation effects of landscape frameworks.

There is reference to Policy D1 in Representation 123. Policy D1 provides the overarching policy for all development to ensure there is quality of Placemaking by design, which includes consideration of a number of different issues including landscape. To highlight a link only to one areas of crossover may be detrimental to other areas where there is policy crossover.

162: Please see Issue 8

163: Please see Issue 6

Additional text

124: There is no overriding need to modify the policy to include the text "water features". Bullet point one of the Policy stresses the existing landscape character,

topography and features and other features of interest will be used to inform quality development. Water features would fall within the definition of other features of interest.

Policy D3: Big Buildings

Support for the Policy

98, 153: We welcome the support for the new Proposed Plan Policy: D3 Big Buildings. The Big Building policy has been drafted in response to consultation submitted for the Main Issues Report (CD29, Issue 11).

Historic Precedent

66: Many factors come into play when assessing Big Buildings as are outlined in the Policy and Proposed Supplementary Guidance: Big Buildings. The production of the Policy and Supplementary Guidance is a result of the consultation into the Main Issues Report. The applications mentioned, Marischal Square (140698) and Union Street (130615 and 131135) have approved planning permissions in place. These sites are not completed to date, with work underway. The success of these buildings is yet to be determined; yet interrogation of the design principles, approved drawings and the Officers Report would suggest that the buildings would have complied in principle to the policy and the associated Supplementary Guidance had these been present at the time of their determination.

Historic Scotland were consultees for the Marischal Square application and as is outlined within their response, "Express satisfaction that the proposed development would not have any significant adverse impact on the setting of Provost Skene's House, Marischal College and Greyfriar's Church. Indeed, state that the setting of these listed buildings and the wider setting of the Conservation Area can be positively transformed by the proposed development. Generally content that the development would sit comfortably in the existing setting, and are pleased that the scheme seeks to better integrate Provost Skene's House with intimate vistas and connections, notably from Broad Street." (RD43). Historic Scotland were also consultees for the Capital Cinema, 431 Union Street, Aberdeen planning and listed building applications. Comments received noted careful assessment in terms of wider visual impact on the particular area of Union Street and the conservation area would need to be achieved. (RD44)

The Big Buildings Policy does not preclude or assume refusal of Big Buildings in the city centre. As is stated in the preamble, Big Buildings can have a positive contribution to city life, an argument supported by Commission for Architecture and the Built Environment (CABE) and English Heritage (Paragraph 1.1) in their 2007 document, 'Guidance on tall buildings'. (RD17)

Policy content

90, 148: The Respondents have concerns about the defined location of Big Buildings and flexibility of the Policy. The most logical location for Big Buildings is within the city centre and its immediate periphery; thereby ensuring high footfall developments

are located within the Regional Centre and close to existing transport hubs, all of which creates sustainable development. Alongside this it will help to create and maintain a vibrant city centre. When big buildings are located well, and are of the correct proportions and design, they can have a positive impact on a city. They can be a catalyst for change, provide greater densities and concentration of uses, bring greater accessibility to a range of amenities, and in themselves be an interesting feature in the streetscape and skyline.

The Policy is not too restrictive; it allows for a high degree of flexibility as there is no design code which must be adhered to. The Proposed Supplementary Guidance document says that consideration needs to be given to site analysis and context, visual analysis, and building design, including materials. It further outlines the principles which can be used to assess Big Building proposals outwith the city centre. It does not restrict Big Buildings to the centre and immediate peripheral area, but again reiterates the most sustainable location for Big Buildings is within the City Centre and its immediate periphery. The positive feedback on Aberdeen University Duncan Rice Library, Robert Gordon's University buildings and the housing development at Oakhill is welcomed.

There are existing clusters of large scale buildings within hospital and education community facility areas. The hospital or education facilities provide a specialised function and service to the immediate community and beyond. The hospital site comprises a core of buildings which are not at a human-scale. The definition of a ‘big building’ is one which exceeds the general height of the surrounding built context and/or whose footprint is in excess of the established development pattern, urban grain, or context on the site. On this site a ‘big building’ would be one which exceeds the existing non-human scale buildings on site. Again, this argument can be used for the buildings on the Robert Gordon Garthdee Campus, and the Modern Campus Area of University of Aberdeen (Character Area C in the Old Aberdeen Conservation Area Character Appraisal) (RD41).

136, 179: The respondents’ note there should be an avoidance of the proliferation of large buildings that are uninteresting and overpowering to existing heritage, including conservation areas. The policy says that proposals for Big Buildings need thorough analysis of the context, to maintain and enhance the pattern and arrangement of the street blocks and plots, have slender vertical emphasis and silhouette. Further detail on Big Buildings is provided in the Proposed Big Buildings Supplementary Guidance (CD25). This document says that consideration needs to be given to site analysis and context, visual analysis, and building design.

The Representations appear to be written from the position that Big Buildings are always detrimental to the existing area. As is stated in the Preamble to the Policy (Proposed Plan paragraph 3.8), Big Buildings can have a positive contribution to city life, an argument supported by CABE and English Heritage in their 2007 document, ‘Guidance on tall buildings’. An Aberdeen example is Marischal College. This is a big building; its floor plate is larger than the surrounding plot ratios, however due to its design, the vertical emphasis and its detailing the building does not appear bulky within its surroundings and is celebrated as a feature of Aberdeen.

The Proposed Policy and Proposed Supplementary Guidance say that visual

analysis is a critical part of the design and assessment process; including the analysis of long, medium and short views, plot ratios, mass, form, et cetera. Therefore setting will be well considered.

With regard to Old Aberdeen, as is identified within the Old Aberdeen Conservation Area Character Appraisal, there are five distinctive character areas, one of which, Character Area C, is the University Campus.

The Respondent discusses comments received by the Local Authority from Historic Scotland (RD45) in response to a consultation on the draft Old Aberdeen Conservation Area Character Appraisal (RD41). The Old Aberdeen Conservation Area Character Appraisal lists perceived opportunities to 'Exploration of Management Partnership Agreement with the University of Aberdeen and Historic Scotland', and 'University of Aberdeen's aspiration for its estate as set out in its strategic planning framework and underlying design principles'. The analysis with the Conservation Area Character Appraisal provides a basis from which to develop strategies to conserve and enhance the conservation area. There is no requirement for a specific Big Building policy for Old Aberdeen. All conservation areas should be treated with the same ethos, and are designated due to their special architectural or historic interest. These is no reason why one conservation area should be regarded are more significant that another.

The Big Building Policy and Supplementary Guidance can be used to assess Big Buildings outwith the city centre. Big buildings will have to be assessed against Policy D1: Quality Placemaking by Design and those within conservation areas will also be assessed against Policy D4: Historic Environment and other local, regional and national policies, not just the Big Building Policy and Supplementary Guidance. This does provide a strong framework.

153: The requirement for Big Buildings to comply with Civil Aviation Requirements is noted in the Proposed Big Buildings Supplementary Guidance. The Policy provides the principles of development and it is not necessary to outline the requirement in the Policy.

Incorrect Appendices/Drafting Errors

90: The reference to the Appendices is a drafting error and have been corrected by the Planning Authority as a Non-Notifiable Modification (CD26).

The drafting error in the opening sentence on page 23 has been amended to read, 'Supplementary Guidance (SG) Big Buildings supports the above policy by assuring quality of Placemaking is provided when tall and/or bulky building developments are proposed'. This is again considered to be a Non-Notifiable Modification.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY D4 & D5: BUILT HERITAGE	19
Development plan reference:	Page 23-25	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr David Fryer of Torry Community Council on behalf of Torry Community Council (35)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Ms Lavina C. Massie on behalf of Culter Community Council (98)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148)
Mr Simon Pallant of Scottish Government Planning and Architecture Division on behalf of Historic Scotland (165)

Provision of the Development Plan to which the issue relates:	To ensure the City's historic environment is protected, retained and reused

Summary of the representation(s):

Policy D4: Historic Environment

Support

98: Support the Policy

Policy Content

165: Policy would benefit from a more explicit statement of the Council's policy with regard to listed buildings i.e. the retention of listed buildings and buildings within conservation areas that contribute to its character. Paragraph four can be removed as this repeats the paragraph above.

Policy D5: Our Granite Heritage

Support

98, 148: Support the Policy

Policy Content

35: The Policy must be bias towards the retention and reuse of buildings. The gradual decline and demolition by owners must not be allowed.

136: Policies should be introduced to enforce maintenance on vacant or unoccupied buildings that may be listed or lie within conservation area. This will stop landowners allowing deterioration through neglect, and then arguing demolition is the only viable

option.

148: Demolition should be permitted when it assists in the wider regeneration of an area.

165: The Main Issues Report outlined the 2012 Aberdeen Local Development Plan Granite Heritage policy "requires to be modified to provide assessment criteria for proposals where demolition is intended and also requires to be clearer on the appropriate reuse of granite in replacement proposals". A more tailored set of criteria can be found to better serve local decision making for undesignated buildings and structures that fall within this Policy. Paragraph 2 does not adequately set out criteria that cover the policy at large

Object to Policy

85: Object to the requirement to retain all buildings, and when demolition acceptable the requirement to re-use the building material onsite.

Modifications sought by those submitting representations:

Policy D4: Historic Environment

Policy Content

165: Reword policy to read: "The Council will protect, preserve and enhance the historic environment in line with Scottish Planning Policy, SHEP, its own Supplementary Guidance and Conservation Area Character Appraisals and Management Plan.

There will be a presumption in favour of the retention and reuse of listed buildings and buildings within conservation areas that contribute to its character. In assessing development proposals the Council support high quality design that respects the character, appearance and setting of the historic environment and protects the special architectural or historic interest of its listed buildings, conservation areas, archaeology, schedule monuments, and historic gardens and designed landscapes.

The physical in situ preservation of all scheduled monuments and archaeological sites will be supported. Developments that would adversely impact upon archaeological remains, including battlefields, of either national or local importance, or on their setting will only be permitted in exceptional circumstances, where there is no practical alternative site and where there are imperative reasons of over-riding public need. In any such case, the applicant must at their own expense:

• take satisfactory steps to mitigate adverse development impacts; and

• where the preservation of the site in its original location is not possible, arrange for the full excavation, recording and publication/curation of the site in advance of

development.

In those cases where this is not justifiable or feasible, provision should be made for excavation and record with an appropriate assessment and evaluation. The appropriate publication/curation of findings will be expected.

Further guidance can be found within the supplementary guidance and technical advice notes listed in Appendix 6".

Policy D5: Our Granite Heritage

Object to Policy

85: Revert to 2012 Aberdeen Local Development Plan Policy to encourage the retention of granite buildings only in appropriate and viable circumstances. The reference to the SHEP Test for demolition should be removed from Policy and instead, set out in the supporting text. The requirement to reuse all of the original granite as a building material with in the development site should be removed.

Policy Content

35: The policy must be bias towards the retention and reuse of buildings.

148: Policy should be amended to reflect demolition can assist in wider regeneration schemes.

165: We request that paragraph 2 of Policy D5 is amended to provide clearer assessment criteria that reflects the aims of this policy.

Summary of response (including reasons) by planning authority:

Policy D4: Historic Environment

Support

98: We welcome and acknowledge the support for the Policy.

Policy Content

165: The principle of the Policy relates to the historic environment which includes listed buildings, conservation areas, archaeology, scheduled monuments, and historic gardens and designated landscapes. The Aberdeen City and Shire Strategic Development Plan 2014 (CD12) requires Aberdeen City to protect its built and historic environment, ensuring that development does not lead to the loss of, or damage to, built, natural or cultural heritage assets. The requirement for the Council to provide a more explicit statement regarding listed buildings narrows the focus of the Policy. The Policy is not specifically for listed buildings. It is agreed that through the Policy there is explicit guidance on scheduled monuments and archaeology, and

there is also mention of the Conservation Area Character Appraisals, therefore it could be perceived the Policy is unbalanced in its approach to listed buildings, but this argument could also be applied to historic gardens and designed landscapes.

The addition of the sentence, “There will be a presumption in favour of the retention and reuse of listed buildings and buildings within conservation areas that contribute to its character” to Proposed Plan Policy D4 could potentially cause conflict with the first sentence of Proposed Plan Policy D5: Our Granite Heritage which reads, “Throughout Aberdeen the Council seeks the retention and appropriate re-use, conversion and adaptation of all granite features, structures and buildings…”Making the change would mean Policy D4 would be stating only granite listed buildings and granite buildings within conservation areas that contribute to its character would have the presumption of retention and reuse while Policy D5 states this is the presumption for all granite building, features and structures. This would create confusion with regard to the overall ethos.

The first paragraph of Proposed Plan Policy says that the Council will adhere to the national guidance of Scottish Planning Policy (CD05) and Scottish Historic Environment Policy (RD13); alongside this the Council will adhere to the localised Supplementary Guidance and Conservation Area Character Appraisals that have been produced for specific circumstances. Within these documents there is a presumption in favour of preserving, retaining and reusing the historic environment, not just those elements which have statutory designations.

We do not consider it necessary to remove paragraph 4 of the Policy. The paragraph reiterates the importance of excavation and recording assets, with the appropriate assessment and evaluation, which are being removed from their in-suit setting. It also outlines appropriate publication/curation of the findings is expected.

Policy D5: Our Granite Heritage

Support

98, 148: We welcome and acknowledge the support for the Policy.

Policy Content

35, 136: Proposed Plan Policy D5 supports the retention and appropriate reuse, conversion and adaption of all granite buildings, the first sentence of the Policy clearly states this. The demolition of buildings with statutory status, those that are listed buildings, or those within conservation areas, have to satisfy strict criteria as outlined in the SHEP (paragraph 3.44, 3.50, 3.58) (RD13). The complete demolition of buildings without statutory status is covered in Class 70 of the General Permitted Development (Scotland) Order 1992 (CD03).

The decline of buildings into a state of despair is dealt with under Building Standards and in particular the (Buildings) Scotland Act 2003 (RD06). The Act introduced new discretionary powers for Local Authorities to deal with defective buildings, as they see appropriate. The Local Authority can undertake the work and recover reasonable costs from the owner. Within Class 70 of the General Permitted Development

(Scotland) Order 1992 there are caveats which include, permission is required to demolish a building if a building has been rendered unsafe or uninhabitable by the action or inaction of any person having an interest in the land on which is building stands and it is practicable to secure safety or health by works of repair or works for affording temporary support.

148: It is acknowledged in point 3 of paragraphs 3.44 and 3.50 of SHEP (RD13) that there can be a relationship between demolition and regeneration when the applicant has demonstrated that every effort has been made to retain the listed building and it can be shown that 'the demolition of the building is essential to delivering significant benefits to economic growth or to the wider community'. Although the principle of regeneration is appropriate in certain circumstances, the overarching principle of SHEP and of Policy D5 is that the retention and reuse of existing buildings and structures is more sustainable. This is our preferred approach. As SHEP paragraph 1.31 states, "...the waste caused by unnecessary demolition and replacement, with consequent loss of embodied energy, the need for landfill and the sourcing and transport of new materials, should be avoided wherever possible". The policy will not be amended to reflect that demolition can assist in wider regeneration schemes

165: The Main Issues (MIR) Report Consultation (RD40, Issue 12) and the research carried out after the consultation helped shape the Proposed Plan Policy. The action outlined in the MIR Response report was to assess the viability of developing criteria for the granite policy. In conducting research into developing criteria based policy we focussed on Class 70 of the General Permitted Development (Scotland) Order 1992 (CD03), Environmental Impact Assessment (Scotland) Regulations 2011 (RD09), Listed Building and Conservation Area expansion, and from this Article 4 Directions within the General Permitted Development (Scotland) Order 1992. We concluded that paragraphs 3.50 and 3.58 of SHEP (RD13) give strong criteria regarding demolition, with the caveat that retention is the always the superior approach. This is the approach we have adopted for statutory buildings. Expanding the criteria of SHEP into non statutory buildings would require an Article 4 Direction. This was investigated with the Councils' solicitors and felt to be onerous and did not fit with the ethos of the modern planning system. The result would be a large increase in the number of planning applications submitted to the planning department, thereby slowing down the process and potentially leading to a number of unauthorised works taking place. A more reasonable approach is to ensure that we are active in identifying and assisting the listing or delisting of buildings and reviewing our conservation areas to ensure they are fit for purpose. A review of conservation areas has led to the expansion of Old Aberdeen Conservation Area.

Object to Policy

85: The principle to retain all granite buildings within the City is the same approach as is currently adopted in the extant Local Development Plan 2012 (Policy D4). The first line of Policy D4: Aberdeen's Granite Heritage within the extant Plan is, "The City Council will encourage the retention of granite buildings throughout the city even if not listed or in a conservation area". This principle has not changed with the Proposed Plan. The requirement to remove the SHEP test reference from the Policy and set this out in the supporting text is not supported. The SHEP tests are national guidance, and the Council will be adhering to these, therefore they are best placed in

the Policy. The principle to reuse granite material when retention and reuse of the feature, building or structure is unviable will not be removed. The principle of the Policy is to retain the distinctive material of Aberdeen, granite, preferably in situ and if this proves unviable then retain on site by use on building elevations, within landscaping and as boundary treatments.
Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	POLICY NC1, NC2 & NC3: CITY CENTRE AND WEST END RETAIL	20
Development plan reference:	Pages 26 - 27, Proposals Maps	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Alasdair Morrison of GVA James Barr on behalf of F&C REIT Asset Management (87)
Mr Ross Anthony of The Theatres Trust (92)
Mr Mike Williams of c/o Scott Hobbs Planning on behalf of Scottish Enterprise (120)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Miss Samantha Jackson of CBRE Ltd on behalf of John Lewis (139)
Mr Matthew Williams of Savills UK Ltd on behalf of Tiger Aberdeen (Jersey) Ltd (Ellandi LLP) (140)
Ms Catherine Thornhill of Savills (UK) on behalf of Hammerson plc (158)
Mr Simon Pallant of Scottish Government Planning and Architecture Division (164)

Provision of the Development Plan to which the issue relates:	Sets out the vision for the city centre, Union Street and the West End

Summary of the representation(s):

Policy NC1: City Centre Development – Regional Centre

General Support

120, 139, 140: Support for Policy.

120: Welcome the introduction of clear Policies that support the development of town centres.

139: Respondent supports this Policy and the Council's strategy to promote development in the city centre. This supports the town centres first principle, which reflects the direction of Scottish Planning Policy. Respondent supports the Council's intention for the city centre to be the preferred location for retail, commercial, leisure and other significant footfall generating development. The town centre first principle applies as much to leisure, entertainment, office and civic uses as retail. Such uses help to enliven the city centre and create a strong day time working population which will in turn support the retail function of the city centre. Restaurant and leisure uses also help to support a diverse evening economy, attracting visitors and bringing money into the city centre. The Council should continue to champion a strong town centre first approach when dealing with out of centre development. This is vital if the right conditions for city centre investment are to be established.

Proposals Map/Omission of Sites

87: Policy identifies four specific locations for retail development. These allocations

are not identified on the Proposals Map.

87: A number of references are made to the significance of the City Centre Masterplan but the Policy does not include some of the sites referred to in the Masterplan as having potential for new retail floorspace.

87: Object to omission of St Nicholas Centre as a potential retail allocation.

References to Culture

92: The Local Development Plan should contain more references to culture. The Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

Sequential Assessment - Business

120: Supportive of the Proposed Plan's intention to encourage the inclusion of all uses which are appropriate to town centres. There needs to be explicit reference to hotel and office development in the city centre given the beneficial impacts that they have on the economy. Respondent attempts to ensure that town centres are the location to be considered first for many forms of development but for the avoidance of doubt this should not be to the detriment of employment uses referred to in Policy B1. There should be a clear supportive policy background for economic development. Respondent requests that consideration is given to specific wording of the Policy to ensure that it will achieve the desired aim of town centre development without unnecessary constraint. Concern that the requirements of NC1 (and associated Supplementary Guidance) are insufficiently clear in relation to its requirements for sequential assessment other than for retail development. There is no other similar Policy elsewhere upon which reliance can be placed.

120: Respondent requests consideration be given to reword the Policy, supporting text (paragraph 3.25) and Supplementary Guidance to provide more information to support the policy and ensure any assessment is robust and to clearly define how the Policy and Supplementary Guidance will work in practice.

120: Further guidance is required on the type and size of office, business, commercial and leisure uses which are expected to locate in town centres, car parking and accessibility requirements, the type of 'tests' which will be required and how other sites can or cannot be differentiated as being 'appropriate'.

120: There should be no constraint in principle to development on existing and allocated B1, B2, B3 and B4 sites and associated Opportunity Sites. There should be no need to address the sequential assessment under NC1 and Supplementary Guidance if such a requirement is retained in the Aberdeen Local Development Plan. Clarification should be included in Policy NC1 to provide certainty as it may be difficult to implement the business and employment allocations to the detriment of economic and employment growth. The employment allocations have been justified in accordance with the Strategic Development Plan. It is unnecessary and counterproductive to the various employment allocations to introduce an additional

level of assessment.

Analysis of Longer Term Opportunities

140: Respondent queries whether analysis has been undertaken to establish if the opportunities identified will be able to accommodate the scale of assessed need for the city centre within the timescales. OP81 is no longer identified for substantial retail development. Ensuring that need can be met within sustainable locations will ensure that harmful out of centre development cannot be allowed to come forward. Respondent queries whether an assessment of floorspace requirements beyond 2022 and up to 2035 has been undertaken and whether longer term opportunities identified are capable of meeting this need.

Policy NC2: City Centre Retail Core and Union Street

Support

158: Supports the policy provision of directing major retail developments to the Retail Core, which must be protected for retail development in the city and wider North East. It is important that NC2 recognises the City Centre Masterplan to reinforce the Council's aspiration that a long-term masterplan is with a linked funding and delivery mechanism.

87: Support the spatial designation of the Retail Core.

158: Respondent supports criterion 2a) regarding proposals for Change of Use.

References to Culture

92: The Local Development Plan should contain more references to culture. The Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

City Centre vs Out of Centre

136: This Policy states that the City Centre Retail Core is the preferred location for retail developments. This should not mean that areas outside of the centre that could benefit from additional retail and commercial development that contribute towards making a balanced and mixed use settlement should be turned down just because there is not a suitable site in the City Centre. This should be given more strength by being included as part of the Policy.

Upper Floors of Existing Buildings/ Change of Use

136: NC2 refers to Change of Use from retail to other uses and lists how it may be acceptable. This list should be used to encourage the use of upper floors in existing buildings. It should make clear that any proposal which involves bringing upper floors back into use will be supported. It is better to have them in use than lying empty

waiting for a retail site.

140: Concerned that the policy is unreasonably onerous and conflicts with Scottish Planning Policy (SPP) which encourages a mix of uses in town centres to support vibrancy throughout the day and into the evening. Particularly concerned with criteria (c). This has the potential to stifle Changes of Use, including the change of use from Class 1 (Retail) to Class 3 (Food and Drink) which can positively contribute to the vibrancy and vitality of town centres and increase shopper dwell time. Urge the Plan to incorporate more flexible policies in connection with Changes of Use in the Core Retail Area.

Clustering of Uses

164: Scottish Planning Policy provides that Plans should include Policies to prevent over-provision and clustering of some non-retail uses (such as betting offices and high-interest money lending premises) where there are concerns about the clustering of these uses. Policy NC2 includes criteria that a Change of Use may be acceptable where "the new use does not create clustering of a particular use in the immediate vicinity". Clusters are not in themselves always a negative and may indeed given an area its distinctiveness. The key point in Scottish Planning Policy is about where clustering would undermine the character and amenity of centres of the wellbeing of communities. Policy should be amended to explicitly include wording that refers to the negative effects of clustering of particular uses so that this can be fully taken account of in decision making.

Policy NC3: West End Shops and Cafes

92: The Local Development Plan should contain more references to culture. The Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

136: NC3 refers to Change of Use from retail to other uses and lists how it may be acceptable. This list should be used to encourage the use of upper floors in existing buildings. It should make clear that any proposal which involves bringing upper floors back into use will be supported. It is better to have them in use than lying empty waiting for a retail site.

164: Scottish Planning Policy provides that Plans should include Policies to prevent over-provision and clustering of some non-retail uses (such as betting offices and high-interest money lending premises) where there are concerns about the clustering of these uses. Policy NC3 includes criteria that a Change of Use may be acceptable where "the new use does not create clustering of a particular use in the immediate vicinity". Clusters are not in themselves always a negative and may indeed given an area its distinctiveness. The key point in Scottish Planning Policy is about where clustering would undermine the character and amenity of centres of the wellbeing of communities. Policy should be amended to explicitly include wording that refers to the negative effects of clustering of particular uses so that this can be fully taken account of in decision making.

Paragraph 3.25

120: Request consideration be given to reword the Policy, supporting text and Supplementary Guidance to provide more information to support the Policy and ensure any assessment is robust and to clearly define how the Policy and Supplementary Guidance will work in practice.

Modifications sought by those submitting representations:

Policy NC1: City Centre Development – Regional Centre

Proposals Map/Omission of Sites

87: The four sites set out in the Policy should be identified on the City Centre Proposals Map.

References to Culture

92: NC1 should be expanded to ensure it maintains, encourages and supports cultural uses in key centres to support their vibrancy, vitality and viability throughout the day and into the evening.

Sequential Assessment – Business

120: Amend the Policy text (amendment in capital letters). Development within the city centre must contribute towards the delivery of the vision for the city centre as a major regional centre as expressed in the City Centre Masterplan and Delivery Programme. As such the city centre is the preferred location for retail, OFFICE, HOTEL, OTHER commercial, leisure and other significant footfall generating development serving a city-wide or regional market. Proposals for new retail, OFFICE, HOTEL, OTHER commercial, leisure and other significant footfall generating development shall be located in accordance with the sequential approach referred to in this section of the Plan and in Supplementary Guidance detailed below, OTHER THAN BUSINESS AND EMPLOYMENT DEVELOPMENT TO BE LOCATED UNDER POLICIES B1, B2, AND B3 OR B4, AND ASSOCIATED OP LAND.

Policy NC2: City Centre Retail Core and Union Street

References to culture

92: NC2 should be expanded to ensure it maintains, encourages and supports cultural uses in key centres to support their vibrancy, vitality and viability throughout the day and into the evening.

Upper Floors of Existing Buildings/Change of Use

164: Amend criterion 2e to read: "the new use does not create overprovision and/or

clustering of a particular use in the immediate vicinity which would undermine the character and amenity of the centre or the well-being of communities; and"

Policy NC3: West End Shops and Cafes

References to Culture

92: NC3 should be expanded to ensure it maintains, encourages and supports cultural uses in key centres to support their vibrancy, vitality and viability throughout the day and into the evening.

Clustering of Uses

164: Amend criterion 4 to read: "the new use does not create overprovision and/or clustering of a particular use in the immediate vicinity which would undermine the character and amenity of the centre or the well-being of communities; and"

Paragraph 3.25

120: Amend text as follows: After "in accordance with this hierarchy.." insert "other than for business use proposed on existing or allocated land under policies B1, B2, B3 or B4, and associated OP land".

Summary of response (including reasons) by planning authority:

Policy NC1: City Centre Development – Regional Centre

Proposed Plan Policy NC1 has been carried forward from the extant Aberdeen Local Development Plan 2012 (CD42) with no fundamental changes. The content of this policy was examined at the Aberdeen Local Development Plan 2012 Examination under Issue 88 (CD44).

General Support

120, 139, 140: Support is noted and welcomed. The Local Development Plan will continue to focus new retail, commercial, leisure and other appropriate uses in the City Centre in accordance to the sequential approach.

139: The Council is committed to supporting the town centre first approach through Policy NC1 reflecting Scottish Planning Policy (SPP) paragraph 60 (CD05). Aberdeen City Council acknowledges that it is important to encourage different uses in town centres such as retail and leisure, community and cultural facilities, as these support the centre's vibrancy, vitality and viability. It will therefore continue to promote a town centre first approach for uses which attract significant numbers of people.

Proposals Map/Omission of Sites

87: The four mentioned sites: Marischal Square, Crooked Lane/George Street, Aberdeen Market and Upper/Basement Floors 73-149 Union Street are included in the City Centre Proposals Maps as OP91, OP102, OP67 and OP96 respectively.

References to Culture

92: Aberdeen the Smart City (RD32) sets out the vision for Aberdeen City Council's coalition administration until 2017. The vision is for Aberdeen to be an ambitious, achieving smart city. One of the priorities is to "ensure that Union Street regains its position as the heart of the city and move cultural activity centre-stage through re-invigorated cultural leadership". The Proposed Plan is a land use plan which supports the development of quality places which sustain and enhance the social, economic, environmental and cultural attractiveness of the city, as outlined in paragraphs 3.1, 3.2, 3.18, Proposed Plan Policy D1 and the six qualities of successful Placemaking.

Aberdeen City Council also has a Cultural Strategy: Vibrant Aberdeen (RD33) which identifies a number of objectives, key requirements, actions and outcomes for the city from 2010 – 2015. More recently the City Centre Masterplan and Delivery Programme (CCMP&DP) (CD33) calls for the city centre to be "culturally distinctive" and ensure the city centre reflects distinctive local culture.

It is not considered necessary to expand Proposed Plan Policy NC1 to specifically mention cultural uses when there is already an overarching holistic approach to the creation of place which is integral to the Vision and Strategy of the Proposed Plan. Reference should also be made to Issue 16 which also discusses this matter.

Sequential Assessment - Business

120: In line with Scottish Planning Policy, the Proposed Plan supports a town centre first approach to retail, commercial and leisure development. Office developments are encouraged into or close to the city centre and a specific West End Office Area has been identified (Proposed Plan Policy B3 which promotes/encourages uses including hotels and offices) along with an area of Specialist Employment Land to the south of Union Square around Poynernook. Paragraph 3.58 recognises the contribution that hotels can have on the city's employment areas. Sites and areas have been identified, through the Proposed Plan City Wide Proposals Map (CD23), and further detail provided in Appendix 2, where employment and mixed use is acceptable in principle. However, demand for city centre locations is high and space is limited and in order to accommodate anticipated business growth, the Strategic Development Plan (CD12) requires significant employment land allocations to be identified. These are mainly concentrated in Bridge of Don, Dyce and the Airport, Kingswells and Altens. Although these are peripheral to the urban area of Aberdeen, they serve a much wider catchment that extends well into Aberdeenshire.

The Proposed Plan, through its business and network of centres policies and associated Supplementary Guidance provide a robust policy framework to ensure the appropriate location of uses throughout the network of centres, allocated sites and landuse zones. Proposed Supplementary Guidance (SG) "Hierarchy of Centres" (CD25) provides the context for the assessment of new development proposals. The

Hierarchy of Centres SG details the type of uses supported in the different centre types e.g City Centre - support all retail, commercial, leisure and other significant footfall generating developments serving a city-wide or regional market. Hotels and offices are likely to serve a city-wide or regional market. Proposed Policy NC4 Sequential Approach and Impact provides further policy detail pertaining to the assessment of significant footfall generating development.

The employment allocations identified through the Strategic Development Plan have been fully met in the proposed Proposed Plan. An employment proposal on land zoned for employment use would not be subject to additional assessment under NC1. An Opportunity Site designation or zoning establishes the type of use acceptable on the site/area, with Appendix 2 providing further information pertaining to usages acceptable on the OP sites.

In light of the robust policy framework detailed above it is not considered necessary to expand upon Policy NC1 or the supporting text at paragraph 3.25.

Analysis of Longer Term Opportunities

140: The updated Aberdeen City and Aberdeenshire Retail Study 2013 (CD16) did not identify any quantitative deficiency of convenience retailing other than in some of the larger expansion areas identified around Aberdeen. These deficiencies have been addressed through allocation in these expansion areas. Paragraph 3.28 of the Proposed Plan highlights retail deficiencies identified in the Aberdeen City and Aberdeenshire Retail Study 2013. The Study took "committed retail opportunity" into account when considering whether additional sites required to be identified. The Retail Study already assesses retail opportunity beyond the lifetime of the Proposed Plan. However, retailing is an industry that can be subject to rapid changes. Retail supply and demand is reliant on the market and overall health of the economy and as such any long term assessment beyond which has already been undertaken would not provide sufficient certainty or reliability. It is likely that further retail studies will be undertaken to inform subsequent Local Development Plans. OP81 is no longer identified for substantial retail development following responses received to the Main Issues Report (RD40).

Policy NC2: City Centre Retail Core and Union Street

Support

87, 158: Support is noted and welcomed.

References to Culture

92: Please see response to same issue as per response to NC1. As discussed above, it is not considered necessary to expand Policy NC2 to specifically mention cultural uses when there is already an overarching holistic approach to the creation of place which is integral to the Vision and Strategy of the Proposed Plan.

City Centre vs Out of Centre

136: In line with Scottish Planning Policy, the Proposed Plan supports a town centre first approach to retail, commercial and leisure development. It is therefore true that Policy NC2 states that the city centre retail core is the preferred location. However Policy NC2 also provides criteria for assessing proposals for retail within the city centre (but outwith the retail core). Furthermore Policy NC1 and associated Supplementary Guidance provides detail pertaining to the hierarchy of centres and the sequential assessment for proposals. In line with Scottish Planning Policy a sequential approach will be used when selecting locations for uses which generate significant footfall including retail. The locations will be considered through a hierarchy of centres which has been set out in Proposed Supplementary Guidance "Hierarchy of Centres". The detail requested by the respondent is therefore already covered in policy.

Upper Floors of Existing Buildings / Change of Use

136: It is agreed that upper floors of Union Street would be better being used than lying empty. A specific allocation has been identified at OP96 to encourage retail uses in the upper/basement floors of 73-149 Union Street. One of the themes of the City Centre Masterplan and Delivery Programme (CCMP&DP) - A City for People (Pages 38 - 41) - involves improving the retail environment and the occupation of upper floors forms part of this. It is expected that site specific developments within the City Centre Masterplan and Delivery Programme will be further worked up by the City Centre Masterplan Team, and these will then feed into future Aberdeen Local Development Plans.

140: In line with Scottish Planning Policy, the Proposed Plan supports a town centre first approach to retail, commercial and leisure development. In response to comments received to the Main Issues Report it was recognised that there needed to be more flexibility regarding Union Street Frontages. Details of the flexibility are published in the “Union Street Frontages” Proposed Supplementary Guidance (SG) (CD25). Proposals to enhance the vitality and viability of Union Street will be supported, however all proposals for Change of Use must enhance or adequately maintain daytime vitality and an active street frontage. The Union Street Frontages proposed SG aims to maintain an appropriate mix and location of shopping, service and commercial leisure functions on Union Street within the Retail Core. It does this by applying minimum percentages of ground floor retail frontage that are required in individual sectors of Union Street. However there will be a greater degree of flexibility with the Proposed SG on proposals for Change of Use from Class 1 (retail) to Class 3 (food and drink). Additionally, and as a change from the extant Local Development Plan, the west end of Union Street has been rezoned to Mixed Use to encourage a wider range of uses – as shown on the Proposed City Centre Proposals Map (CD22). The Proposed Plan and associated Proposed Supplementary Guidance therefore already provide a robust policy framework to enhance the vitality and viability of Union Street (and wider city centre retail core). The Council does not support any relaxation to the Policy when flexibility is already accounted for within the associated Supplementary Guidance.

Clustering of Uses

164: In line with Scottish Planning Policy (paragraph 67) the Proposed Plan has included Policies and Supplementary Guidance (Harmony of Uses) (CD25) to support an appropriate mix of uses. Additional policy provision has been added in the form of criterion 2e) (as per paragraph 67 of SPP) to prevent over-provision and clustering of particular activities which would undermine the character and amenity of centres or the well-being of communities. The Respondent seeks to ensure that it is the negative aspect of clustering of particular uses that is taken into account when assessing proposals for Changes of Use. Criterion 2e) of Policy NC2 is one of six criteria which will be used to assess the suitability of proposals for Changes of Use away from retail within the City Centre Retail Core. All criterion need to be satisfied and so negative ramifications such as sensitive amenity issues will be assessed under all criterion. In recognition of the distinctiveness of place and building upon the West End Office Area Policy, the Proposed Plan has introduced a new Policy supporting independent retail and cafes in the West End (NC3). The same level of protection will be afforded, but specialist shops, cafes and offices will be encouraged. In these areas, clusters of particular uses have been identified and supported. It is appreciated that clusters are not always a negative. It is not considered necessary to add additional detail to criterion e) when the detail requested by the Respondent is already sufficient covered in the other five criterion, in other Proposed Plan Policy (specifically Policy D1: Quality Placemaking by Design and the six qualities of successful Placemaking) and in associated Proposed Supplementary Guidance.

Policy NC3: West End Shops and Cafes

References to Culture

92: Please see response to same issue as per response to NC1 and NC2. As discussed above, it is not considered necessary to expand Policy NC3 to specifically mention cultural uses when there is already an overarching holistic approach to the creation of place which is integral to the Vision and Strategy of the Proposed Plan.

Change of Use

136: Please see response to same issue as per response to NC2.

Clustering of Uses

164: Please see response to same issue as per response to NC2. As discussed above, it is not considered necessary to add additional detail to criterion 4) when the detail requested by the Respondent is already sufficiently covered in the other five criterion, in other Proposed Plan Policy (specifically Policy D1: Quality Placemaking by Design and the six qualities of successful Placemaking) and in associated Proposed Supplementary Guidance.

Paragraph 3.25

120: Please see response to same issue as per response to NC1. In light of the robust policy framework detailed above it is not considered necessary to expand upon Policy NC1 or the supporting text at paragraph 3.25.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY NC4, NC5, NC6, NC7, NC8 & NC9: SUPPORTING RETAIL CENTRES	21
Development plan reference:	Page 28-31, Proposals Map	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr John Handley of John Handley Associates on behalf of Standard Life Assurance Ltd (34)
Mr John Findlay of Ryden LLP on behalf of European Development Holdings Limited (58)
Mr Alasdair Morrison of GVA James Barr on behalf of F&C REIT Asset Management (87)
Mr Fraser Littlejohn of Montagu Evans LLP on behalf of Zurich Assurance Limited (88)
Mr Alasdair Morrison of GVA James Barr on behalf of Leto Limited (89)
Mr Ross Anthony of The Theatres Trust (92)
Mr Chris Pattison of Turnberry Planning Ltd on behalf of The Grandhome Trust (101)
Mr Mike Williams of Scott Hobbs Planning on behalf of Scottish Enterprise (120)
Mr Steven Robb of GVA James Barr on behalf of Aldi Stores Ltd (130)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Miss Samantha Jackson of CBRE Ltd on behalf of John Lewis (139)
Mr Matthew Williams of Savills UK Ltd on behalf of Tiger Aberdeen (Jersey) Ltd (Ellandi LLP) (140)
Ms Catherine Thornhill of Savills (UK) on behalf of Hammerson plc (158)
Mr Simon Pallant of Scottish Government Planning and Architecture Division (164)

Provision of the Development Plan to which the issue relates:	Outlines the hierarchy of centre and encourages retail use in appropriate locations.

Summary of the representation(s):

Policy NC4: Sequential Approach and Impact

Support

58, 101, 120, 130, 136, 139, 140: Support the Policy and the recognition of Commercial Centres.

Commercial Centre

88: Accept the premise that, “all significant footfall generating development appropriate to town centres should be located in accordance with the hierarchy and sequential approach”. Welcome the identification of Kittybrewster Retail Park as a Commercial Centre.

The Policy is inconsistent with paragraphs 24, 27, 68 and 69 of Scottish Planning

Policy. The Policy suggests certain proposals are precluded in certain locations. SPP does not preclude uses which generate significant footfall within commercial centres.

References to Culture

92: The Local Development Plan should contain more references to culture. The Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration

New Communities

101: Designating centres outwith the city centre are important to help create sustainable mixed communities. Phase 2 of Grandhome will serve as a Town Centre for the Grandhome development as well as the wider Bridge of Don area.

Business and Sequential Approach

120: There will be no need for the sequential assessment for office and business developments if they are to be located in in B1, B2, B3, B4 sites and this should be made explicit.

Site Specific

130: Support for the Policy is put into practice through the intention on to locate at the proposed Cornhill Neighbourhood Centre.

Policy Content

139, 140: This Policy should also apply for Change of Use and amendments to extant Planning Permission. Permitting new development in out of town centre locations will be detrimental. This would ensure all changes to provision are properly tested in terms of their contribution to vitality and viability.

Policy NC5: Out of Centre Proposals

Support

87, 120: Support there is no very large single retail unit allocation. Also support that no other out-of-centre retail allocations are made other than those associated with and ancillary to large scale new residential communities.

Object

89: Object to the Policy as it does not offer a list of proposed out of centre retail allocations in Appendix 2, as it does for City Centre proposals.

There is insufficient certainty offered as to where additional retail capacity should be located. The Plan should identify specific sites. The city centre may not be able to

accommodate the forecasted retail capacity.

References to Culture

92: The Local Development Plan should contain more references to culture. The Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

Business and Out of Centre Proposals

120: There will be no need for the sequential assessment for office and business developments if they are to be located in in B1, B2, B3, B4 sites and this should be made explicit.

Policy Content

139: Out-of-centre developments will have the most adverse impact on city centre developments. Out-of-centre developments should be required to provide an impact assessment for developments over 2,500 square metres and which are not in accordance with the Development Plan. Explicit reference could be made about the need to carry out an Impact Assessment to ensure that the proposal, either individually or cumulatively, will have no impact.

140: This Policy and NC4 could be merged. Perth and Kinross Local Development Plan Policy RC4 provides far more clarity and could be used as a template.

Policy NC5 should be used to test OP65 - Haudagain Triangle before it can be allowed to come forward. Unclear whether this site is intended to meet the retail floorspace requirements identified and what type of need this retail park is intended to meet.

Policy NC6: Town, District, Neighbourhood and Commercial Centres

Support

130: Support this Policy.

Site Specific

34: Respondent welcomes identification of Denmore Road as an important retail centre, zoned as Commercial Centre. The area has potential to become a new centrally-located ‘District Centre’.

34: Respondent welcomes identification of the Boulevard Retail Park as an important retail centre, zoned as Commercial Centre. The area has potential to become a new centrally-located ‘District Centre',

130: Policy will ensure protection of retail at Cornhill Shopping Arcade and reflects

the long term use of this location. Forthcoming Aldi proposal in this area welcomes the Policy.

References to Culture

92: The Local Development Plan should contain more references to culture. The Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

Policy Content

136: Policy should encourage more than just retail. Office or other commercial use adds 24-hour vitality to an area. These are locating in Queen's Road and Carden Place which were previously residential; it is becoming more commercial than mixed use. Use some of the space in existing town or neighbourhood centres to be available for small and medium size offices.

Supporting Text

158: The requirement for applicants to provide evidence regarding Change of Use, as outlined in paragraph 3.29 should be deleted. The information is often commercially sensitive and negative statements could undermine the vitality of the area in which it is located.

Clustering of Uses

164: Scottish Planning Policy provides that Plans should include policies to prevent over-provision and clustering of some non-retail uses (such as betting offices and high-interest money lending premises) where there are concerns about the clustering of these uses. Policy includes criteria that a Change of Use may be acceptable where "the new use does not create clustering of a particular use in the immediate vicinity". Clusters are not in themselves always a negative and may indeed given an area its distinctiveness. The key point in SPP is about where clustering would undermine the character and amenity of centres of the wellbeing of communities. Policy should be amended to explicitly include wording that refers to the negative effects of clustering of particular uses so that this can be fully taken account of in decision making.

Policy NC7: Local Shop Units

References to Culture

92: The Local Development Plan should contain more references to culture. The Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

Policy NC8: Retail Development Serving New Development Areas

Support

87, 136: Support the Policy and the requirement for retail developments which serve a wider area be subject to a sequential test and Retail Impact Assessment.

References to Culture

92: The Local Development Plan should contain more references to culture. The Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

Policy Content

136: Policy should include space for office and leisure developments also as this will add to the vitality of the area.

Policy NC9: Beach and Leisure

Support

34: Support the recognition of the beach as a major leisure development, the rezoning from Urban Green Space to Beach and Leisure, and the restriction of further retail development. Support the suggested Masterplan for the beach.

References to Culture

92: The Local Development Plan should contain more references to culture. The Plan should ensure that all residents and visitors have access to cultural opportunities. Policies that support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

Modifications sought by those submitting representations:

Policy NC4: Sequential Approach and Impact

Commercial Centre

88: The Local Development Plan should refine Policy NC4 to better and more straightforwardly reflect the requirements of Scottish Planning Policy.

References to Culture

92: Expand NC4 to ensure it maintains, encourages and supports cultural uses in key centres to support their vibrancy, vitality and viability throughout the day and into

the evening.

Business and Sequential Approach

120: Preamble paragraph 3.25- Add the following text to the end of the paragraph: ”other than for business use proposed on existing or allocated land under policies B1, B2, B3 and B4, and associated OP land”.

Policy- Add the following text- paragraph 2 first sentence: “all significant footfall generating development appropriate to town centres, other than those proposed on B1, B2, B3 or B4 and associated OP land... Paragraph 3 opening text In these circumstances, p..”

Policy Content

139: Policy should be strengthened to ensure that any proposal in Commercial Centres has to demonstrate it will not have significant adverse impact on other city/town centres, or future strategies for enhancing the vitality and viability of the city centre, by providing an impact assessment.

Included criteria requiring the proposal to address a qualitative or quantitative deficiency within the catchment area and a restriction on the type of goods that can be sold in commercial centres locations.

140: Request that the Policy is more explicit in its requirements to undertake Retail Impact Assessment for Commercial Centres which would apply to proposals for extensions, Changes of Use and proposals to modify planning obligations and other planning controls.

The Policy should be amended to reflect Scottish Planning Policy where planning authorities have the discretion to advise when Retail Impact Assessment is necessary for smaller retail and leisure proposals.

Policy NC5: Out of Centre Proposals

References to Culture

92: Expand NC5 to ensure it maintains, encourages and supports cultural uses in key centres to support their vibrancy, vitality and viability throughout the day and into the evening.

Business and Out of Centre Proposals

120: Add text to paragraph 1: “All significant footfall generating development appropriate to designated centres other than development on B1, B2, B3 or B4 and OP land…”

Policy Content

139: The following text may be added to the second bullet point in Policy NC5: "An impact assessment has been undertaken ... which demonstrates that there will be no adverse effect on the vitality or viability of any centre listed in the Hierarchy of Centres ... either individually or cumulatively."

Policy NC6: Town, District, Neighbourhood and Commercial Centres

Site Specific

34: Request that Denmore Road Retail Park is designated as a 'District Centre', acknowledging its existing place in the retail hierarchy and potential for further improvement and expansion to meet the identified retail needs for a wider catchment area.

34: Identify the Boulevard Retail Park as a District Centre.

References to Culture

92: Expand NC6 to ensure it maintains, encourages and supports cultural uses in key centres to support their vibrancy, vitality and viability throughout the day and into the evening.

Commercial Centre

158: Amendment of the supporting text to delete the requirement in paragraph 3.29 to provide evidence that the property has been actively marketed for six months or more, and a statement from prospective occupiers explaining why the property is unsuitable for retail use.

Clustering of Uses

164: Amend Policy to read: “the new use does not create overprovision and/ or clustering of a particular use in the immediate vicinity which would undermine the character and amenity of the centre or the well-being of communities; and”

Policy NC7: Local Shop Units

References to Culture

92: Expand NC7 to ensure it maintains, encourages and supports cultural uses in key centres to support their vibrancy, vitality and viability throughout the day and into the evening.

Policy NC8: Retail Development Serving New Development Areas

References to Culture

92: Expand NC8 to ensure it maintains, encourages and supports cultural uses in key centres to support their vibrancy, vitality and viability throughout the day and into

the evening

Policy NC9: Beach and Leisure

References to Culture

92: Expand NC9 to ensure it maintains, encourages and supports cultural uses in key centres to support their vibrancy, vitality and viability throughout the day and into the evening.

Summary of response (including reasons) by planning authority:

National Planning Framework 3 (CD04) reflects the importance of town centres as a key element of the economic and social fabric of Scotland. Scottish Planning Policy (CD05) paragraph 60 reflects the importance of a town centre first approach when planning for uses which attract significant numbers of people, encourage a mix of uses, support successful town centres and consider opportunities for promoting residential use. This approach has been principal in developing the 'NC' policy principles. The Aberdeen City and Shire Strategic Development Plan 2014 (SDP) (CD12) paragraph 4.2 states, "a sequential approach will be taken to identifying sites for new retail development across the strategic development plan area".

Policy NC4: Sequential Approach and Impact

Support

58, 101, 120, 130, 136, 139, 140: The support for the Policy is welcomed. The Proposed Plan will continue to focus new retail, commercial, leisure, and other appropriate uses in accordance with the sequential approach.

Commercial Centres

88: We welcome the support for the identification of the site as a Commercial Centre. The Respondent has argued that the Policy is inconsistent with Scottish Planning Policy, as it will preclude certain significant footfall generating development from certain locations. As no specifics are outlined it is unclear which section of the Policy the comment is directed to. Proposed Plan Policy NC4 outlines a sequential approach will be required for assessing significant footfall developments. Specific reference to Commercial Centres is mentioned in paragraph 8 of the Policy, "Proposals for bulky goods shall only be located in a commercial centre if a suitable site is unavailable in the first, second or third tiers of the hierarchy". This is not limiting the location of bulky good to Commercial Centres but is saying, following a town centre first approach, that bulky good are preferred in the First, Second or Third Tier and will only be permitted in Commercial Centres if there is no suitable location within the earlier Tiers.

The final paragraph of the Policy does outline there will be a restriction imposed on the amount of comparison good floorspace allowed within convenience shopping

development outside the city centre and other town centre. The principle of the retail policies is to ensure retail uses are protected and supported within the five Tiers outlined in the Hierarchy of Centres, which will include ensuring there is a mix of uses to ensure vibrancy, vitality and viability. An overprovision or clustering of comparison goods within convenience shopping developments of Tiers 3, 4 and 5 could have a detrimental impact on these retail areas in terms of vibrancy, vitality and viability.

Reference to Culture

92: Aberdeen - the Smarter City (RD32) sets the vision for Aberdeen City Council's coalition administration until 2017. The Vision is for Aberdeen to be an ambitious, achieving smart city. One of the priorities is to "ensure that Union Street regains its position as the heart of the city and move cultural activity centre-stage through re-invigorated cultural leadership". The Proposed Plan is a land use plan which supports the development of quality places which sustain and enhance the social, economic, environmental and cultural attractiveness of the city, as outlined in paragraphs 3.1, 3.2, 3.18, Proposed Policy D1 and the Six Qualities of Successful Placemaking.

Aberdeen City Council also has a Cultural Strategy: Vibrant Aberdeen (RD33) which identifies a number of objectives, key requirements, actions and outcomes for the city from 2010-2015. More recently the City Centre Masterplan and Delivery Programme (CCMP&DP) (CD33) calls for the city centre to be "culturally distinctive" and ensure the city centre reflects distinctive local culture.

It is not considered necessary to expand the Policy to specifically mention cultural uses when there is already an overarching holistic approach to the creation of place which is integral to the Vision and Strategy of the Proposed Plan. Reference should also be made to Issue 16 which also discusses this matter.

New Communities

101: We agree that designated centres outwith the city centres are important to create sustainable mixed communities as is outlined in paragraph 3.27 of the Proposed Plan. Grandhome (OP9) has been rolled forward in the Proposed Plan from the extant Local Development Plan 2012 (CD42), and we intend to roll forward the Grandhome Development Framework for this site as Supplementary Guidance to the Proposed Plan upon its adoption. Policy NC8 specifically addresses retail development serving new development areas. The designation of the site as a town, district or neighbourhood centre will be agreed once it has been built, and is in operation. It is recognised that Phase 2 of the Grandhome site is expected to be delivered beyond 2018 (Grandhome Development Framework).

Business and Sequential Approach

120: In line with Scottish Planning Policy (CD05), the Proposed Plan supports a town centre first approach to retail, commercial and leisure development. Office developments are encouraged into or close to the city centre and a specific West End Office Area (Proposed Plan Policy B3) has been identified, along with an area of

Specialist Employment Land to the south of Union Square around Poynernook.

Sites and areas have been identified, through the Proposals Map and further detail provided in Appendix 2, where employment and Mixed Use is acceptable in principle. Demand for city centre locations is high and space is limited and in order to accommodate anticipated business growth, the Strategic Development Plan (CD12) requires significant employment land allocations to be identified. These are mainly concentrated in Bridge of Don, Dyce and the Airport, Kingswells and Altens. Although these are peripheral to the urban area of Aberdeen, they serve a much wider catchment that extends well into Aberdeenshire.

The principle of business use is established in areas zones as B1: Business and Industry and B2: Specialised Employment Land. Within the B3: West End Office Area there is a principle of maintaining a balance between protecting the historic environment and allowing office development in the area, while B4: Aberdeen Airport supports the development of airport compatible uses.

As discussed in Issue 1, we contend that the employment allocations identified through the Strategic Development Plan have been fully met in the Proposed Plan. Compatible proposals on land zoned or identified for a particular use would not be subject to additional assessment under Proposed Plan Policy NC4 (for example employment uses on employment land). An Opportunity Site or zoning establishes the type of use acceptable on the site/area with Appendix 2 providing further information pertaining to usages acceptable on the Opportunity Sites.

In light of the robust policy framework detailed above it is not considered necessary to expand upon Policy NC4 or the supporting text at paragraph 3.25

Site Specific

130: The detail of the proposal regarding an Aldi at the Cornhill Neighbourhood Centre is subject to a pending planning application (151113).

Policy Content

139: Commercial Centres are identified within paragraphs 61 and 63 of Scottish Planning Policy (CD05) as being part of the Network of Centres, and are those with a more specific focus. Within the Proposed Supplementary Guidance document, Hierarchy of Centres (CD25), which sits alongside and gives more detail on the Policy, Figure 1: Retail Hierarchy and Sequential Approach says that Commercial Centres support the large bulky goods and comparison shopping only. The Proposed Supplementary Guidance also provides, in Figure 2: Sequential Approach Thresholds, further information on the hierarchy and where Commercial Centres are located within this hierarchy with regard to differently sized convenience developments, differently sized general comparison and differently sized bulky goods. In all situations, Commercial Centres are located close to the bottom of this hierarchy.

Paragraph 10 of the Proposed Plan outlines that vitality and vibrancy are paramount, “In all cases, proposals shall not detract significantly from the vitality and viability of

any centre listed in the Supplementary Guidance, and shall accord with all other relevant policies in the Plan…"

Therefore, there is no requirement to add text to the Policy outlining "any proposal in commercial centres has to demonstrate it will not have significant adverse impact on other city/town centres, or future strategies for enhancing the vitality and viability of the city centre, by providing an impact assessment".

The Proposed Supplementary Guidance also states that there is support for large bulky goods and comparison only in Commercial Centres, and this applies when city centre/town centre sites are not available. There is no requirement for including criteria requiring the proposal to address a qualitative or quantitative deficiency within the catchment area and a restriction on the type of goods that can be sold in Commercial Centres locations. The last paragraph of the Policy restricts the amount of comparison goods floorspace allowed within convenience shopping development outside the city centre or other town centres.

139, 140: The Council has adopted a strong town centre approach. We agree that permitting new development in out- of-town centre locations will degrade the town centre first approach. With regard to applying the policy to Change of Use proposals, there is a separate Policy within the Proposed Plan, Policy NC6: Town, District, Neighbourhood and Commercial Centres, which states that retail is the preferred use within these Centres, and that Change of Use from retail will only be permitted in certain circumstances. Paragraph 3.29 of the Proposed Plan outlines that Change of Use proposals need to provide evidence that the property has been actively marketed for six months or more and should provide a statement(s) from prospective occupiers explaining their reasons for the property being unsuitable for retail use. In addition, Policy NC5: Out of Centre Proposals states that out-of-centre proposals will only be permitted in certain circumstances. Therefore there is no reason to modify the Policy to take account of Change of Use as the principle of this is covered in Proposed Plan Policy NC6. The 'NC' policies provide a strong framework for retaining retail in the defined centres. The Policy applies to proposals to extend existing developments; therefore amendments to extant planning permissions are already expected to conform to this Policy.

The requirement to undertake a Retail Impact Assessment (RIA) for smaller retail and leisure proposals which may have a significant impact on vitality and viability is at the discretion of Officers within the Council's Development Management Team, as is outlined in paragraph 71 of SPP.

Policy NC5: Out of Centre Proposals

<u>Support</u>

87, 120: The support for the Policy is welcomed.

<u>Object</u>

89: The over-riding principle with the 'NC' policies to create a town centre first approach, as is outlined by Scottish Planning Policy, and to support the hierarchy of

centres. Out-of-centre developments are contrary to this principle, therefore there is a presumption they will be refused unless proposals satisfy the criteria outlined within Policy NC5, alongside other local, national and regional policy and guidance. Therefore, out-of-centre proposals will not be mapped. The Retail Core, District Centres, Town Centres, Neighbourhood Centres and Commercial Centres are mapped as they form the Hierarchy of Centres where retail is expected to be located.

There are specific sites identified with the Proposed Plan for retail; these are identified in paragraph 3.22, and in Appendix 2 through OP Sites OP67: Aberdeen Market, OP91: Marischal Square, OP96: Upper/Basement Floors 73-149 Union Street and OP102 George Street, Crooked Lane. Further to this, as discussed in paragraph 3.22 of the Proposed Plan, and paragraph 2.88 of the Aberdeen City and Aberdeenshire Retail Study 2014 (CD16) (page 163 of 377) further expansion and improvements to the existing retail stock in the City Centre Retail Core will be encouraged. The Retail Study outlines a number of solutions to accommodating the 30,000 square meters of retail capacity within the city centre, as per page 22 of the Executive Summary.

References to Culture

92: Please see response to same issue as per response to NC4. As discussed above, it is not considered necessary to expand Policy NC5 to specifically mention cultural uses when there is already an overarching holistic approach to the creation of place which is integral to the Vision and Strategy of the Proposed Plan.

Business and Out of Centre Proposals

120: In line with Scottish Planning Policy (CD05), the Proposed Plan supports a town centre first approach to retail, commercial and leisure development. Office developments are encouraged into or close to the city centre and a specific West End Office Area has been identified, along with an area of Specialist Employment Land to the south of Union Square around Poynernook.

Sites and areas have been identified, through the Proposals Map and further detail provided in Appendix 2, where employment and mixed use is acceptable in principle. Demand for city centre locations is high and space is limited and in order to accommodate anticipated business growth, the Strategic Development Plan (CD12) requires significant employment land allocations to be identified. These are mainly concentrated in Bridge of Don, Dyce and the Airport, Kingswells and Altens. Although these are peripheral to the urban area of Aberdeen, they serve a much wider catchment that extends well into Aberdeenshire.

The principle of business use is established in areas zones as B1: Business and Industry and B2: Specialised Employment Land. With the B3: West End Office Area there is a principle of maintaining a balance between protecting the historic environment and allowing office development in the area, while B4: Aberdeen Airport supports the development of airport compatible uses.

The employment allocations identified through the Strategic Development Plan have been fully met in the Proposed Plan. Compatible proposals on land zoned or

identified for a particular use would not be subject to additional assessment under Policy NC5 (for example employment uses on employment land). An OP site or zoning establishes the type of use acceptable on the site/area with Appendix 2 providing further information pertaining to usages acceptable on the OP sites.

In light of the robust policy framework detailed above it is not considered necessary to expand upon Policy NC5.

Policy Content

139: There is no requirement to repeat the text from Proposed Plan Policy NC4 that, 'Out-of-centre developments should be required to provide an impact assessment for developments over 2,500 square metres and which are not in accordance with the development plan'. Out-of-centre proposals will be assessed against Policy NC5 and Policy NC4, along with a number of other national, regional and local policy and guidance, therefore there is no requirement to repeat the text from one policy within another policy.

140: The principle of merging Policy NC4 and NC5 is not sound. Policy NC4 outlines the Hierarchy of Centres giving certainty regarding the town centre first approach. Policy NC5 has a principle of refusal, whereby it has to be proven that the development cannot be accommodated within the five Tiers of the Hierarchy of Centres. Merging the two Policies would cause uncertainty and may weaken the principle of supporting and encouraging development within the identified locations. The Haudagain Triangle site would be tested against Policy NC5 amongst others if a planning application for a retail park was submitted in this location. The site is not intended to meet the retail floorspace requirements identified by the Aberdeen City and Aberdeenshire Retail Study 2014.

With regard to the reference to the Perth and Kinross Council Policy, the Policy points within this Policy are already covered by Proposed Policy and Supplementary Guidance in the Proposed Plan. The principle of Policy NC4 is to ensure there is no detrimental impact to retail centres. Policy NC6 outlines there must be no undermining of the principle function of centres, and Policy NC4 and the Proposed Supplementary Guidance outline the Hierarchy of Centres, whereby a town centre first principle and sequential approach to development is applied. The scale of development is a fundamental aspect of Policy D1: Quality Placemaking by Design. All developments are subject to consultation with the Council's Roads Projects Team. Transport Assessments, as outlined in SPP are to be carried out for significant developments. The Proposed Transport and Accessibility Supplementary Guidance (CD25) outlines the gross floor areas of developments where transport assessments and transport statements are required for proposals in Aberdeen.

Policy NC6: Town, District, Neighbourhood and Commercial Centre

Support

130: We welcome the support for the Policy

Site Specific

34: The definition of a District Centre is outlined in the Glossary of the Proposed Plan. A District Centre is, 'Groups of shops outwith the city centre, usually containing at least one food supermarket or superstore and non-retail services. These may take a variety of forms'. There is no supermarket or superstore at the Denmore Road Retail Park. The Commercial Centre is formed from two large warehouse type units, with the unit to the south being a single occupier, the unit to the north being split into three units, two of which are unoccupied. Certificate of Lawfulness were granted in 2009 (090333 & 090334) for both warehouse units. They are noted to be both unrestricted Class 1 Retail. The existing use within both units on site is bulky goods.

A Planning Permission in Principle application to redevelop the existing retail units to form a single Class 1 Retail unit was submitted and approved conditionally in 2011. This consent expired on 10 June 2014 (101203). On 11 March 2014, a Proposal of Application Notice was submitted for the redevelopment of the existing retail units to form a single Class 1 Retail unit. It was determined further consultation was required. A further application, for Detailed Planning Permission 151324 was validated on 07 August 2015 for 'Refurbishment of Existing Retail Terrace, formation of new mezzanine within Unit 2, resurfacing and extension of car park, reconfiguration of existing service yard and erection of new coffee pod unit.' This application is currently pending.

As per the definition of District Centre, there is no supermarket or superstore in operation on site and so the site should not be zoned a District Centre.

34: The Boulevard Retail Park fits the definition of a Retail Park in the Proposed Plan as it is a grouping of three of more retail warehouses with associated car parking. The Boulevard Retail Park does not fit the definition of 'District Centre' as it primarily offers a retail function with only one unit (DW Sports Fitness) offering a mixed Class 1 and Class 11 Use. The Boulevard Retail Park does not reflect the mix of uses expected in a District Centre.

130: The detail of the proposal regarding an Aldi at the Cornhill Neighbourhood Centre is subject to a pending planning application (151113).

Reference to Culture

92: Please see response to same issue as per response to NC1. As discussed above, it is not considered necessary to expand Policy NC6 to specifically mention cultural uses when there is already an overarching holistic approach to the creation of place which is integral to the Vision and Strategy of the Proposed Plan

Policy Content

136: The Town, District, Neighbourhood and Commercial Centres are all part of the Hierarchy of Centres, with the City Centre forming Tier 1. Retail health checks are carried out bi-annually by the Council to assess the function, vitality and vibrancy of the sites which make up the five Tiers. Proposed Plan Policy NC6 makes the presumption of retail function within these Tiers. The Policy does not dismiss or

exclude small or medium sized offices from being located within these areas, but for this to occur, points 1 to 7 of the Policy would have to be satisfied. All large footfall generating developments would be appropriate in the City Centre. The streets specifically mentioned (Carden Place and Queen's Road) are zoned under Policy B3: West End Office Area. There is a presumption of office related activity within this area. The West End Office Area has been in place for a number of years and was present within the Aberdeen City District-Wide Local Plan 1991 (RD36), the Aberdeen Local Plan 2008 (CD43) , the extant Aberdeen Local Development Plan 2012 (CD42) and is being taking forward within the Proposed Plan.

Supporting Text

158: The requirement to provide evidence that a retail unit has been actively marketed from six month or more provides justification for the non-retail use. The principle of a retail use is identified within Policies NC2, NC5 and NC6. A proposal to remove this use would need to explained and justified. A mix of uses is acceptable within these areas but the principle of a retail function should not be lost.

Clustering of Uses

164: In line with Scottish Planning Policy (paragraph 67) (CD05) the Proposed Plan has included Policies and Proposed Supplementary Guidance ("Harmony of Uses") to support an appropriate mix of uses. Additional policy provision has been added (as per paragraph 67 of SPP) to prevent over-provision and clustering of particular activities which would undermine the character and amenity of centres or the well-being of communities. The Respondent seeks to ensure that it is the negative aspect of clustering of particular uses that is taken into account when assessing Changes of Use. Criterion 6 of Policy NC6, focusses on clustering and is one of seven criteria which will be used to assess the suitability of proposals for Change of Use away from retail within Town, District, Neighbourhood and Commercial Centres. Further to this, criterion 7 also states, "the alternative use does not conflict with the amenity of the neighbouring area". All criterion need to be satisfied. The modification sought by the Respondent is already outlined in criterion 6 and 7 within the Policy.

Policy NC7: Local Shop Units

References to Culture

92: Please see response to same issue as per response to NC1. As discussed above, it is not considered necessary to expand Policy NC7 to specifically mention cultural uses when there is already an overarching holistic approach to the creation of place which is integral to the Vision and Strategy of the Proposed Plan.

Policy NC8: Retail Development Serving New Development Areas

Support

87, 136: We welcome the support for the Policy.

References to Culture

92: Please see response to same issue as per response to NC1. As discussed above, it is not considered necessary to expand Policy NC8 to specifically mention cultural uses when there is already an overarching holistic approach to the creation of place which is integral to the Vision and Strategy of the Proposed Plan

Policy Content

136: The areas to which this Policy applies are major land release residential developments allocation. These are to be developed to be sustainable communities, therefore alongside the residential use there is to be commercial uses and community facilities. These communities will be self sustaining with a mix of uses, with have integrated sustainable transport methods and will provide a range of facilities and services for those people living within them, and others in surrounding areas. All major land release residential developments allocations have Development Frameworks or Masterplans adopted as Supplementary Guidance to the extant Local Development Plan 2012 which we intend to readopt as Supplementary Guidance to the Proposed Plan once adopted. The Policy also states, "…should allocate retail and related uses at an appropriate scale to serve the convenience shopping needs of the expanding local community". Alongside this, the Aberdeen City and Aberdeenshire Retail Study 2013 (CD16) Executive Summary outlines specific requirements for retail function within the Newhills, Countesswells and Grandhome Developments. The Masterplans and Development Frameworks for Newhills, Countesswells and Grandhome outline employment opportunities, education facilities, retail and leisure can be planned alongside residential development as an integrated mix of uses. The Development Frameworks outline they are intending to create hubs of civic, retail, leisure and office spaces. Therefore there is no requirement to modify the Policy to outline office and leisure uses as these are already dictated within the Masterplans and Development Frameworks for the major land release residential developments allocation.

Policy NC9: Beach and Leisure

Support

34: The support for the new Policy is welcome. We also note the support for paragraph 3.30 and the potential to commission a Masterplan for the beach if it is decided that it will help benefit the area. The City Centre Masterplan and Delivery Programme (CD33) investigated linkages and connectivity to the beach and outlined interventions on Castlegate would enhance connectivity to the beach.

References to Culture

92: Please see response to same issue as per response to NC1. As discussed above, it is not considered necessary to expand Policy NC9 to specifically mention cultural uses when there is already an overarching holistic approach to the creation of place which is integral to the Vision and Strategy of the Proposed Plan.

Reporter's conclusions:
Reporter's recommendations:

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Body or person(s) submitting a representation raising the issue (reference no.):

Mr Rab Dickson of Nestrans (59)
Ms Susanne Stevenson of Scottish Water (76)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Ms Lavina C. Massie on behalf of Culter Community Council (98)
Clare Pritchett of Scottish Environment Protection Agency (124)
Mrs Elaine Farquharson-Black of Burness Paull LLP (132)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148)
Mr Blair Melville of Homes for Scotland (149)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Miss Jennifer Woods of NLP Planning on behalf of British Airways (153)
Mr Oliver Munden of Persimmon Homes (157)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Infrastructure requirements for new developments, including developer obligations.

Summary of the representation(s):

Support

59: Welcome reference to Cumulative Transport Appraisal and the Strategic Transport Fund in the Plan and Supplementary Guidance.

76: Policy clearly directs developers to the Action Programme.

98: Support for 'Delivering Infrastructure and Accessibility' being addressed in the Proposed Plan.

124: Support for promotion of appropriate infrastructure for new development including connection to public sewerage system wherever possible.

152: Supports the policy requirements.

153: Support for the general principle within the Policy that appropriate contributions will be sought by the Council from developers for infrastructure improvements based upon the scale and type of development proposed. It is important that planning policy in Aberdeen does not unduly restrict the respondents operations or capacity at Aberdeen Airport but enables this operator to develop its operations to meet demand and where infrastructure is needed to support the Airport that there is an appropriate

mechanism to bring this forward.

General Objection

85: Planning obligations being imposed are becoming a "roof tax" on development. Objection taken to ever expanding list of services and infrastructure which developers are expected to contribute to, particularly where those services are the statutory responsibility of others who receive Central Government funding through taxation for their functions.

Circular 03/2012

85: Policy fails to mention or have proper regard to Scottish Government Circular 03/2012: Planning Applications & Good Neighbour Agreements. No reference is made to the tests set out in that Circular, all of which must be met before Planning Obligations can be sought.

152: Policy should clearly identify that infrastructure requirements will be secured in accordance with the required policy tests contained in Circular 03/2012: Planning Obligations and Good Neighbour Agreements.

183: Circular 03/2012 should be quoted in the Policy for the avoidance of doubt, contributions 'must always be related and proportionate in scale and kind to the development in question.'

132: Concern that Policy and Supplementary Guidance is placing existing practice on a statutory footing without examination of the methodology. There is no reference to the policy tests contained within the Scottish Government Circular 03/2012. Wording of the Policy should be amended to make it clear that contributions must relate reasonably in scale and kind to the proposed development as well as being necessary to make the proposed development acceptable in planning terms. It should also clearly reflect that contributions will not be used to resolve existing deficiencies in infrastructure provision or to secure contributions to the achievement of wider planning objectives which are not necessary to allow permission to be granted for a particular development.

Policy/SG Split

149: The Plan does not include some policy matters contained in Supplementary Guidance. Notably around periods for which the Council will retain monies and mechanisms for holding and accounting for monies.

Policy

183: Omit "or exacerbate deficiencies in existing provision" from the first paragraph. It is not the function of developer obligation payments to improve existing shortfalls in the provision of facilities. Object to the sentence, "The precise level of infrastructure requirements and contributions will need to be agreed with the Council and other statutory agencies." It is not right that other agencies could determine the fate of

planning proposal.

Preamble (3.32 - 3.25)

183: Paragraph 3.34 - The sentence “there may be circumstances where development imposes additional pressures and requires more extensive contributions to those identified in the Local Development Plan and Action Programme.” undermines Appendix 3 and the Action Programme, and is contrary to Scottish Planning Policy which focuses on the need for certainty.

183: Paragraph 3.35 - The sentence, “before a decision notice on a planning application can be issued.” is incorrect. A decision notice can be issued with a condition for a Section 75 Agreement to be signed.

Strategic Transport Fund

85: There are no grounds for contributions to the Strategic Transport Fund.

Health

148: Policy now recognises infrastructure requirements but does not go far enough to address the concerns of NHS Grampian. No reference to the requirement for brownfield, windfall or OP sites to contribute to infrastructure requirements, including healthcare facilities. Developer obligations must be recognised for Health services where brownfield sites will add pressure to existing facilities. Request opportunity to review the locations of proposed developments and develop a similar table to that for the Masterplan Zones. It is important that contributions are received from sites with the potential for planning consents as identified in Table 1, Appendix 1.

85: There are no grounds for contributions to healthcare provision. Contributions to health facilities are unacceptable. Many medical centres, dental facilities and community pharmacies primarily operate as commercial ventures and should not expect to receive funding from developers. Health care is funded by Central Government through taxation.

149, 157, 183: There is no immediate and automatic relationship between new development and location of new local facilities. Decisions on if and where to provide new facilities are taken by health boards and local bodies such as primary healthcare trusts.

149: Paragraph 3.91 is unreasonable and potentially beyond the powers and abilities of a planning authority to implement. The situation with healthcare is not analogous to other sorts of infrastructure.

149, 157, 183: Respondents believe the Council would not be able to demonstrate the need or detriment, or planning purpose for any Condition which deals with healthcare contributions. It is unclear what evidence the Council can produce of service deficiencies, pressures placed on services by new development or programmes of new provision. Without this evidence Planning Authorities cannot

make any developer obligation meet the five tests of Circular 1/2013. It would be unable to demonstrate need or detriment, and would be unable to say what planning purpose was being met by an obligation.

149: Paragraph 3.91 is unreasonable and potentially beyond the powers and abilities of a planning authority to implement. The situation with healthcare is not analogous to other sorts of infrastructure. Respondent refers to English Appeal decision 2157515 Moat House Farm, Eldon Road regarding the provision of healthcare and use of financial contributions. Moat Farm case established that provision is a matter for the healthcare authorities, funded through general taxation and that planning's role is to ensure that land is available as and when new facilities are brought forward.

149, 183: Proposed Plan gives no indication of where and when health service infrastructure might be needed.

149: Proposed Supplementary Guidance would have to contain clear and firm proposals from the NHS as to what it intended to provide, where and when. This is an operational matter for NHS rather than the Council. It is not clear that the Council will be able to produce Supplementary Guidance which would meet the tests of Circular 1/2013. No arrangements with the NHS exist for repayment of unused funds. It is inappropriate for developers to be replacing/supplementing UK taxation expenditure. Accountability and control of funds is a significant issue.

157: Refers to submissions made by another respondent (149) on this topic. Healthcare is a statutory requirement, funded through UK general taxation, and the services are not typically delivered by Councils. A planning authority would not be able to demonstrate the requirement to collect contributions towards health care meets with the 5 tests set out within Circular 1/2013, and therefore not suitable to collect contributions for. Developer contributions to infrastructure are typically provided through planning conditions or agreements. They are paid to the Council and held in clearly-differentiated accounts with the provision of repayment if unused within their anticipated timescales. No such arrangements are in place with the NHS, notwithstanding the view of Respondent 149 that it is inappropriate for developers to be replacing/supplementing UK taxation expenditure. Accountability and control of funds would be a significant issue.

183: Object to the inclusion of Health facilities. Healthcare is a statutory requirement. Services are not typically delivered by Councils. Healthcare is not governed by requirements around the location of services, and the tendency in healthcare has been centralisation and specialisation. See planning appeal in England (Planning Inspectorate Ref: 2157515: Moat House Farm, Elmdon Road).

Water and Drainage

76: Respondent is pleased to see developers are encouraged to approach the appropriate provider. There could be more of an emphasis on the benefits of early engagement. The Development Impact Assessment process has been superseded by Pre-Development Enquiry (PDE) forms. It is recommended that all developments

of more than a single house submits a PDE form.

Discounts/Mixed Use Sites

136: There is a desire to build single use sites. Mixed use allows for some traffic mitigation as it gives people the opportunity to live and work in the same area, possibly within walking distance. In calculating the need for developer contributions relating to a mixed use scheme, some form of allowance should be made for the fact that it is mixed use and this could be a reasonable deduction in planning obligations relating to transport. This would be one way to encourage the delivery of mixed use areas.

Page 33

76: Developers are responsible for providing water and wastewater infrastructure needed to support their site rather than make financial contribution towards Developer Obligations. Page 33 of the Proposed Plan includes water and drainage in the list of possible areas requiring a financial contribution.

132: Clarification is needed that contributions will not be required from all developments towards all of the items listed and will considered on a site by site basis. Concerned that, when read in conjunction with the Policy, this will provide statutory support for requests towards all items. It must be clear that contributions sought under each heading will relate directly to the impact which the development has, in scale and kind, and not just to a general need.

Area specific issues

98: There are continuous concerns on traffic and transport infrastructure on A93 and B979, lack of parking and regular drainage and flooding problems. Respondent would appreciate developer contributions to be maximised to ease traffic and transport problems with regards to all OP sites included in the LDP.

Modifications sought by those submitting representations:

Circular 03/2012

85: References should be included in the Policy, supporting text to Circular 03/2012. It should be highlighted that contributions " ... must always be related and proportionate in scale and kind to the development in question as set out in the Circular".

152: Insert after "The precise level of infrastructure requirements and contributions will need to be agreed with the Council and other statutory agencies." "in accordance with the policy tests contained in Circular 03/2012: Planning Obligations and Good Neighbour Agreements.

Policy

183: Omit “or exacerbate deficiencies in existing provision” from the first paragraph. Clarity in Policy to ensure that all developer obligations are ”must always be related and proportionate in scale and kind to the development in question".

Strategic Transport Fund

85: The requirement for contributions to the Strategic Transport Fund should be removed from the Plan.

Health

85: The requirement for contributions to healthcare facilities should be removed from the Plan.

149, 183: Remove all references in the Community Facilities section and Appendix 3 to developers making financial contributions to healthcare facilities.

157: Respondent agrees with comments made by Respondent 149 and request that the entire policy wording set out under community facilities should be removed in total from the Plan, and any references made elsewhere also removed.

148: Policy amended to make specific reference to healthcare facilities. The first paragraph should read: "Where development either individually or cumulatively will place additional demands on community facilities or infrastructure, 'including healthcare facilities' that would necessitate new facilities or exacerbate deficiencies in existing provision. . ."

148: It should also refer to infrastructure requirements relating to Appendix 1 (Brownfield) and 2 (Opportunity Sites), as well as windfall sites.

148: A table of amendments to Appendix 3 are detailed in the response submitted which are necessary to reflect changes in NHS Grampian’s requirements since the extant Local Development Plan was prepared.

Water & Drainage

76: More emphasis on early engagement.

Page 33

76: Page 33 of the Plan requires clarification

Summary of response (including reasons) by planning authority:

From the outset of the review of the extant Local Development Plan (CD42), the Council has taken a proactive approach by identifying infrastructure required to

support new development. This process has involved working with a range of organisations through the Future Infrastructure Requirements for Services (FIRS) Group to assess the capacity of existing infrastructure and its ability to cope with new development in each area of the City, and to then assess additional infrastructure required.

Proposed Plan Policy I1 – Infrastructure Delivery and Planning Obligations and Appendix 3 set out the broad principles including the items for which contributions will be sought and the occasions when they will be sought. Additional detail on the methodology used and the criteria that should be used to calculate developer contributions is provided in the Proposed Supplementary Guidance: Planning Obligations Manual (CD25). The Proposed Action Programme (CD21) outlines further details on the delivery of supporting infrastructure. Both the Proposed Supplementary Guidance and Action Programme can be updated to take account of changing circumstances as sites come forward. We propose to carry forward the same broad approach and principles from the extant Local Development Plan into the Proposed Plan, with some minor updates and wording changes.

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination (Issue 5 pages 54 – 74) (CD13). The Reporter's conclusion stated "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agrees with these conclusions. As a reflection, the vast majority of sites identified in the Proposed Plan have also been 'rolled forward' and, as such, Appendix 3 with the Proposed Plan has not changed significantly from Appendix 4 within the extant Plan.

We propose to carry forward the same approach and principles from the extant Local Development Plan 2012 into the Proposed Plan with regards to infrastructure delivery and planning obligations. The principle and detail of the policy approach was examined in depth at the Aberdeen City Local Development Plan 2012 examination under Issue 90 (CD44). The approach adopted in the Proposed Plan is appropriate as the detail has been previously examined, it is a 'tested policy approach' and there has been no material change in the interim.

Developer Obligations Assessments undertake a detailed review of the impact of a development on local infrastructure in line with the Development Plan, policy tests set out in Circular 03/2012 Planning Obligations and Good Neighbour Agreements (CD11) and baseline data. Any contributions sought therefore require to be fully justified.

Support

59, 76, 98, 124, 153: Support for the principle of the approach taken by Aberdeen City Council in assessing infrastructure requirements associated with new development and publishing these in the Proposed Plan and Proposed Action

Programme is noted and welcomed.

General Objection

85: As detailed above, the approach promoted in the Proposed Plan is the same as was promoted in the extant Local Development Plan 2012. Whilst there has been a review/rationalisation of the topic areas for contributions as part of the Supplementary Guidance drafting process, there has been no expansion of services and infrastructure which developers may be requested to contribute towards. Bearing in mind that the majority of the Proposed Plan sites have been 'rolled forward' from the extant Local Development Plan, and the majority of these have agreed Development Framework/Masterplans, planning consents and/or have begun construction it would not be reasonable to apply different requirements to these sites. As detailed above, the Proposed Action Programme reflects the most up to date position with regards to infrastructure delivery.

Circular 03/2012

85, 132, 152, 183: The issues raised were considered at the Examination into the extant Local Development Plan 2012 (Issue 90) and Circular 01/2010 (RD23) (superseded by Circular 03/2012).

85, 132, 152, 183: It is agreed that developer contributions can only be sought where they comply with the requirements of Circular 03/2012 Planning Obligations and Good Neighbour Agreements. Circular 03/2012 paragraph 2 states "Planning authorities should promote obligations in strict compliance with the tests set out in the circular". The Council considers it inappropriate and unnecessary to repeat the contents of SPP or Scottish Government circulars or refer to them explicitly in the policy or supporting text. This would lead to unnecessary repetition and the references could become outdated within the five year lifespan of the Local Development Plan.

132, 183: Proposed Plan Policy I1 is clear that the level of provision required will relate to the development proposed either directly or to the cumulative impact of development in the area and be commensurate to its scale and impact. This is in line with Circular 03/2012.

132: Circular 03/2012 recommends that methods and exact levels of contributions should be included in supplementary guidance and this is the approach taken with both the extant Local Development Plan and the Proposed Plan. Opportunities for discussion about the precise need for infrastructure and the process for delivery are identified in both the Proposed Plan and the Proposed Supplementary Guidance.

132: Proposed Plan Policy I1 and the Proposed Supplementary Guidance are clear that existing deficiencies in public services, facilities or infrastructure can be made worse by new development and new deficiencies created. However, contributions are intended to address only matters arising from new proposals, not existing deficiencies. In terms of contributions being necessary, the Policy again clearly states "Where development either individually or cumulatively will place additional demands on community facilities or infrastructure that would NECESSITATE

(emphasis added) new facilities....". Page 33 summaries the content of Proposed Supplementary Guidance - Planning Obligations and clearly states "Contributions will be sought, where necessary, for ..". The Proposed Supplementary Guidance details when and where a contribution may apply and how the contribution would be calculated.

In light of the robust and previously examined policy framework detailed above it is not considered necessary to expand upon Proposed Plan Policy I1 or the supporting text at paragraphs 3.32 - 3.35.

Policy/SG Split

149: In line with Circular 06/2013 (paragraph 139) items for which financial or other contributions will be sought and the circumstances where they will be sought have been identified in the Proposed Plan. Exact levels of contributions or methodologies for their calculations have been included in the proposed supplementary guidance as per Circular 06/2013 (paragraph 139). Procedural matters such as retention of monies, mechanisms for holding and accounting for monies are matters of detail best left to supplementary guidance. Procedural details can be subject to change and to include such information in the Local Development Plan with a five year lifespan would be unnecessarily restrictive for both the council and applicant. This approach conforms to Circular 03/2012 (paragraph 35) which advises that information on how monies will be held, how they will be used and, if applicable, how they will be returned to the developer should be included in supplementary guidance where standard charges and formulae are being used.

Policy

183: As detailed above Proposed Plan Policy I1 and the Proposed Supplementary Guidance are clear that existing deficiencies can be made worse by new development. However, contributions are intended to address only matters arising from new proposals and not the existing deficiencies. It is unrealistic to argue that an existing shortfall nullifies the need for intervention. Circular 03/2012 (paragraph 21) states "It is inappropriate to grant planning permission for a development which would demonstrably exacerbate a situation which was clearly already unsatisfactory."

183: It is appropriate that the Council consult with other statutory agencies regarding the precise level of infrastructure requirements and contributions. Whilst the Council worked with various infrastructure providers to assess the overall infrastructure requirements for the Proposed Plan during its preparation, the Council are not responsible for delivering all of the items of infrastructure - such as health, transport and water infrastructure. The Proposed Plan and Proposed Supplementary Guidance both advocate early and continued engagement and there are ample opportunities at both Masterplanning and planning application stages for negotiations to take place. The Proposed Action Programme outlines further details on the delivery of supporting infrastructure and as a "live" document can be updated to take into account changing circumstances.

Preamble (3.32 - 3.25)

183: Circular 03/2012 (paragraph 30-31) recognises that the plan led approach allows for early consideration of likely contributions that might be sought from developers. However it also recognises "Development plans cannot, however, anticipate every situation where the need for a planning obligation will arise". As detailed above the approach taken by the Council aimed to provide as much certainty as possible, as early as possible, to identify infrastructure required to support development. It is not reasonable to assume that the level of contributions and circumstances (for both the Council and developer) will not change over the lifetime of the Plan and the allocations (which for some of the larger sites can be 15-20 years). For example the cost to provide a primary school will not be the same in 15 years as it is today. Equally, changes in education provision/school roll forecasts may show that a new school might not be required and that an extension would suffice thus reducing infrastructure costs. The Proposed Action Programme and associated Supplementary Guidance to Policy I1 provide the appropriate vehicle to reassess where circumstance requires it.

183: In the vast majority of cases a legal agreement under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended, (CD02) does need to be agreed with the Council prior to a decision notice being issued. It is not the intention of the Proposed Plan to cover all circumstances of when a decision notice can be issued. The most common use of planning obligations is to ensure the provision of infrastructure to make a development acceptable in planning terms. Without a signed agreement the development would not be acceptable in planning terms and as such, decision notices are not normally issued prior to the receipt of an agreed and signed legal agreement.

Discounts/Mixed Use Sites

136: While acknowledging that there may be circumstances where contributions could be waived or reduced, this would be achieved through negotiations between the Council and other statutory agencies and should only happen in exceptional circumstances.

Strategic Transport Fund

85: Since the publication of the Proposed Plan; Supplementary Guidance to the Aberdeen City and Shire Strategic Development Plan (SDP): Strategic Transport Fund (CD19) has been adopted (25th June 2015) by the Aberdeen City and Shire Strategic Development Planning Authority and following ratification by both constituent councils came into force on 28 August 2015. The new statutory guidance replaces the non-statutory guidance which had been in force for the last three and a half years. The Strategic Transport Fund is a contribution which is identified in the Proposed Plan and associated SDP Supplementary Guidance and can be requested from eligible sites going through the planning process. The principle of this contribution is outwith the remit of this Examination.

Health

There are policies and guidance in place at local, regional and national level to ensure that development mitigates against negative impacts and all proposals are expected to conform to these. The requirement for healthcare contributions meets the policy tests as set out in Circular 03/2012: Planning Obligations and Good Neighbour Agreements and the principle of contributions towards healthcare facilities is clearly set out in the Proposed Plan. Further detail is provided through Proposed Supplementary Guidance: Planning Obligations. The methodology and approach developed ensures that there is a clear link between the development and the proposed contributions, basing this on national guidelines on floorspace (Scottish Health Planning Note 36 Parts 1-3) (RD14) and patient numbers anticipated from a development.

85, 149, 157, 183: Responsibility for the National Health Services in Scotland is a devolved matter and therefore rests with the Scottish Government. The Scottish Government allocates health care funding to the 14 NHS Territorial Boards covering the whole of Scotland and the seven national or 'special' NHS Boards. The Scottish Government sets national objectives and priorities for the NHS, signs delivery plans with each NHS Board and Special NHS Board, monitors performance, and supports Boards to ensure achievement of these key objectives. The NHS Boards in Scotland plan, commission and deliver NHS services for their populations. The majority of new healthcare facilities are being delivered and funded by the local health board (NHS Grampian).

85, 149, 157, 183: Given the above; where there are clear and statutory requirements placed on the NHS to provide healthcare and similarly on Local Authorities to provide public services, such as education and social care, there is no difference between contributions to health, community, education etc as long as it meets the criteria set out in the Circular 03/2012. All developers will be required, where necessary, to contribute towards their provision, in order to mitigate the impact of development.

85, 149, 157, 183: New development places additional requirements on existing healthcare infrastructure. Additional population growth within an area, results in additional residents utilising healthcare facilities, generating a requirement for additional capacity. Developer contributions are therefore sought to mitigate the impact of development where an existing healthcare facility (either general GP medical service, dental facility, community pharmacy) is at capacity or the scale of the development would trigger the requirement for such a facility. Contributions are solely identified for capital works for the provision of additional capacity (e.g. extension to an existing health centre) and are not used for any associated revenue costs or furniture costs of which other funding is directed towards.

85, 149, 157, 183: Developer contributions for healthcare facilities are held by the Local Authority and drawn down by NHS Grampian when required. Prior to the release of funds the Local Authority would review the details of the proposed project to ensure that it met the relevant criteria and ensure all appropriate invoices and paperwork are provided, in line with normal practice.

85, 149, 157, 183: These contributions recognise the wider remit of contributions that are required as a result of new development. It is acceptable to include contributions

towards health care provision (in terms of capital costs) due to the impact that new development has on healthcare facilities. This matter was considered through the Examination into the extant Local Development Plan 2012 (Issue 90, 'Reporter's conclusions' paragraph 38) where the Reporter stated "Where the evidence gathered shows the proposed development would create a need for the health facility, I consider that that is a direct relationship between the two and the requirement meets the tests in paragraph 11 of Circular 01/2010" (now superseded by paragraph 14 of Circular 03/2012).

85, 149, 157, 183: The detail of requirements for health facilities arising because of development was provided by NHS Grampian. NHS Grampian has assessed the capacity and catchment areas of existing services and facilities, and have recommended where new or improved facilities are required. The Council considers that it is reasonable to highlight where new development would trigger the need for new services such as health facilities. The delivery of health facilities will need to be discussed and agreed with NHS Grampian at the Masterplanning and planning application stages.

149, 183: Contributions towards infrastructure outwith the control of the Council are identified in Appendix 3 of the Proposed Plan.

148: Bearing in mind that the majority of sites in the Proposed Plan have been carried forward from the extant Local Development Plan 2012 and are considerably progressed (and have their infrastructure requirements established through adopted development frameworks/masterplans) it would not be reasonable to apply different requirements to these sites. The opportunity was provided to NHS Grampian during the Plan preparation process and in consultation with all FIRS members. As detailed above, the Proposed Action Programme reflects the most up to date position with regards to infrastructure delivery.

148: It is not accepted that the Proposed Plan is not sufficiently clear relating to contributions being sought for OP sites, brownfield and windfall sites. Paragraph 2 of Proposed Plan Policy I1 clearly states that infrastructure requirements to Masterplan Zones and other allocated sites are set out in Appendix 3 and 4. Infrastructure requirements and level of contributions for other development (this includes windfall sites) will be assessed using the criteria set out in the Proposed Supplementary Guidance: Planning Obligations. Healthcare is specifically mentioned as a contribution topic area on page 33 of the Proposed Plan and is detailed in the Proposed Supplementary Guidance. Additional sites which may arise through the lifetime of the Proposed Plan will be assessed using the robust policy framework highlighted through Policy I1 and the associated Supplementary Guidance. The healthcare requirement detail is provided by the NHS who input data into the Action Programme regarding healthcare facilities. Data on healthcare facilities from non-masterplanned zoned sites when forthcoming from the NHS will be programmed into the Action Programme.

148: Appendix 6, Table 1 and 2 provides an evidence base relating to meeting the housing requirement identified in the Aberdeen City and Shire Strategic Development Plan. It is not intended to be used as a means to identify infrastructure requirements arising from the listed sites as these sites may not have been put

forward as a bid for development and limited certainty would be gained through assessing them.

Water and Drainage

76: Page 33 of the Proposed Plan summarises the content of Proposed Supplementary Guidance - Planning Obligations and lists the contribution areas where contributions may be sought. The Proposed Supplementary Guidance details when and where a contribution may apply and how the contribution would be calculated. Proposed Supplementary Guidance - Planning Obligations clarifies the issue raised by the respondent. In respect of water and drainage the contribution relates to creation/provision of Regional Sustainable urban Drainage Systems (SuDS) and this is an optional contribution area. Regional SuDS could be built by Aberdeen City Council, on land owned by the Council and 'space' made available either through planning agreements or as commercial agreements, between the Council and developers.

Area Specific Issues

98: There are policies and guidance in place at local, regional and national level to ensure that development mitigates against its impact and all proposals are expected to conform to these. Proposed Plan Policy I1 will apply to all sites and all developers will, where necessary, be required to provide infrastructure or services, or a contribution towards their provision, in order to mitigate the impact of development. Whilst we appreciate the concern raised by the Community Councils, the Proposed Plan and associated Proposed Supplementary Guidance provide a robust basis for ensuring that contributions are sought to mitigate the negative impacts of proposed new development. There is no order of priority or preference for contributions e.g. transport as priority, then education, health etc. Contributions are sought as they are required to make the development acceptable in planning terms.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY T1, T2 & T3: TRANSPORT AND ACCESSIBILITY	23
Development plan reference:	Page 35-38, Proposal Map	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Rab Dickson of the North East of Scotland Transport Partnership (59)
Mr William Sell of Craigiebuckler and Seafield Community Council (66)
Mr Roger Laird of Archial Norr on behalf of BP Midstreams Pipelines (108)
Mr Derek Webster (112)
Ms Jyll Skinner of Aberdeen Cycle Forum (115)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Miss Samantha Jackson of CBRE LTD on behalf of John Lewis (139)
Miss Jennifer Woods of NLP Planning on behalf of British Airways (153)
Ms Catherine Thornhill of Savills (UK) on behalf of Hammerson plc (158)

Provision of the Development Plan to which the issue relates:	The viability and need for future transport infrastructure, assessing & managing the transport impacts of new developments and supporting and encouraging active and sustainable travel.

Summary of the representation(s):

Policy T1: Land for Transport

General Support

59: Supports Raith's Farm Rail Freight Facilities as reservation for transport related activities

153: Supports safeguarding of land for transport projects, specifically A96 Park and Ride, Dyce Railway Station and the Aberdeen Western Peripheral Route which will improve connectivity to Aberdeen Airport.

Berryden Corridor Improvements

112: Objects to the design of the Berryden Corridor scheme. The associated road infrastructure such as pedestrian and cycle paths and traffic signals are not clear on the plans. Concerned about the health, safety and quality implications and is interested to know whether the Infrastructure Committee was presented the right information during the design and construction permission stage. There has been no adequate response to impact on properties.

Sustainable Transport Infrastructure

115: Sustainable transport infrastructure for new developments such as walking and

cycling facilities should be given equal priority to car transport if a modal shift is desired. Consultation should be undertaken with national and local groups to ensure infrastructure is suitable for intended users.

Raith's Farm Rail Freight Facility

108: Land at Raith's Farm Rail Freight Facility is within the pipeline consultation zone. Planning Advice for Developments near Hazardous Installations regulations state that any proposed transport links within the inner consultation area will result in an 'advise against' response from the Health and Safety Executive. This should be included in the Policy or supporting text.

158: This site should be rezoned as business and industrial land as it will not be required for future expansion of the rail freight facility. It would be suitable for business and industrial uses given its proximity to road and rail networks. The landowner requires the site for Class 6 storage and distribution uses associated with the operation of Union Square shopping centre. Aberdeen City Council should ensure there is a range of marketable allocated sites for businesses in the Local Development Plan.

Policy T2:Managing the Transport Impact of Development

General Support

153: Supports sufficient measures being taken to minimise traffic generation and maximise opportunities for sustainable and active travel. Supports the need to manage traffic generation in the Aberdeen but this should not be at the expense of building upon the Airport's future role.

158: Supports utilising existing transport network in Aberdeen.

Consultation

115: Groups experienced in using and designing facilities should be consulted before the process of maximising opportunities for sustainable and active travel is taken forward to ground-breaking.

Increased Traffic

136: Concerned about increased traffic at peak times as a result of new development such as the single-use Prime Four development. Aberdeen City Council should consider the impact of such schemes on existing neighbourhoods for example by carrying out a walkable neighbourhood analysis before committing to particular transport proposals. Supports how employment opportunities created by the development of new communities reduce the need to travel.

City Centre Car Parking

158: Easy access to the City Centre Retail Core is crucial to minimising generated

traffic and maximising sustainable and active travel. Union Square acts as a strategic city centre car park and so to help meet this function and to facilitate its floorspace growth, additional parking capacity should be provided. Creating strategic car parking in the North Dee business district would multiply commuter car trips, which would be harmful to the City Centre Masterplan aims.

Policy T3: Sustainable and Active Travel

General Support

59: Supports the objective of reducing congestion and improving air quality in the city centre, and encouraging sustainable travel.

139: Supports improvements to Aberdeen's transport network to make movement around the city centre easier for shoppers. Supports emphasis on links between residential, employment, recreation and other facilities for non-motorised transport users.

153: Supports the need for new developments to demonstrate sufficient measures have been taken to minimise traffic generation and to maximise sustainable and active travel opportunities. Supports the need to manage traffic generation in the Aberdeen but this should not be at the expense of building upon the Airport's future role. Supports the recognition that there will still be instances in which people will be required to travel by car in order to access the Airport.

Developer Contributions

66: Aberdeen City Council should subsidise unprofitable routes because industries such as catering and entertainment are losing revenues due to a lack of evening bus services. Developers should be required to contribute to public transport and liaise with public transport providers, as well as providing paths and cycle routes.

Sustainably Accessible Developments

115: Would like to see the emphasis on all developments to be 'accessible with an emphasis on active and sustainable transport'.

City Centre Connectivity

139: This Policy should act as a catalyst for improving connectivity between the streets and shopping centres of Bon Accord, Union Square and Trinity Shopping Centre. Developments in the city centre should be expected to provide or promote links with other facilities in the centre to ensure convenient and safe access for people. This Policy and the forthcoming City Centre Masterplan should ensure new retail developments are integrated with existing transport networks and different modes of transport. Measures should be introduced to strengthen the relationships between shopping areas and transport hubs in Aberdeen.

City Centre Car Parking

139: Caution should be applied towards restrictions on car parking/car access to a significant level as this could deter future shoppers from visiting the city centre and in turn impact upon its vitality and viability, particularly in the face of out-of-town developments with free car parking.

Modifications sought by those submitting representations:

Policy T1: Land for Transport

Berryden Corridor Improvements

112: The design of the road has not factored a satisfactory design that was promised in 2010 such as the appraisal of impacts on 1 Belmont Gardens on Ashgrove Road; this is the most affected property in the scheme. Aberdeen City Council has not adequately addressed the impacts on this property. Tender issues should not be issued until addressed.

Raith's Farm Rail Freight Facility

108: Reference the presence of pipeline included in the Policy in relation to Raith's Rail Freight facility.

158: Site should be rezoned as Business and Industrial land and recognised as an Opportunity Site.

Policy T2:City Centre Car Parking

158: Acknowledge and confirm that Union Square provides the optimum location for the provision of additional car parking at the southern gateway to the city centre.

Summary of response (including reasons) by planning authority:

Policy T1: Land for Transport

General Support

59, 153: Support is welcomed and noted.

Berryden Corridor Improvements

A preliminary design was prepared, based on the relevant design standards for all road users, to assess the impact of improving the Berryden Corridor and, once the

decision was taken to progress with this improvement, the preliminary layout was used as the base within the Proposed Plan. One of the purposes of a Local Development Plan is to safeguard land for particular uses, and the route shown does not necessarily dictate the finished detailed layout. Once a more detailed design is prepared, which will reference factual information as well as ground surveys, the direct impacts will be available for presentation as part of technical submissions and for discussion with affected parties as well as those in the wider area.

Sustainable Transport Infrastructure

115: The Proposed Plan fully supports sustainable transport infrastructure such as walking and cycling not only for new, but also for existing, developments. Aberdeen City Council recognises that high quality facilities that enable and encourage people to walk, cycle or use public transport for a variety of journey purposes (including work and education trips and for recreation) must be delivered in tandem with new development. The Council therefore works with developers to ensure that appropriate infrastructure is in place to enable this from the very first day of occupation. Developers are required to ensure that new developments are accessible by walking, cycling and public transport, and that the internal layout of developments also favours these modes. There are policies in place (including Designing Streets: A Policy Statement for Scotland 2010 (CD06) and Cycling by Design 2010 (RD16)) which new developments are required to adhere to, that promote pedestrian and cycle friendly design, and aim to ensure that the needs of those on foot or bike take precedence over those driving vehicles. The Proposed Plan takes cognisance of, and aligns itself with the aspirations of the Consultative Draft Aberdeen Local Transport Strategy 2015 (Draft LTS) (CD34), the North East of Scotland Transport Partnership (Nestrans) Regional Transport Strategy 2013 (RTS) (CD15) and the National Transport Strategy 2006 (NTS) (CD09), all of which prioritise walking, cycling and public transport. With regards to consultation being undertaken with national and local groups, the preparation of the Proposed Plan included public consultation during the Main Issues Report (MIR) (CD29) and Proposed Plan stages, of which Aberdeen City Council consulted national, regional and local bodies and the public regarding Policies contained within the Plan. Furthermore, consultation with a wide range of stakeholders and the general public is normally undertaken during the Masterplanning (where appropriate) and planning application stages when the details of the proposed development have been further investigated.

Raith's Farm Freight Facility

108: The function of Proposed Plan Policy T1 is to safeguard land for transport projects that are listed therein. The Raith's Rail Freight Facility is zoned under Policy T1 (Improved Rail Services) for the future expansion of the rail facility. With regard to the presence of the pipeline on the site, consultation with the appropriate body would be undertaken as and when necessary consents are required for this expansion. Pipeline notification is already covered in Proposed Plan Policy B6 and the notification zones are shown on the Additional (reverse) City Wide Proposals Map. It is not considered necessary to repeat this in Policy T1 or the supporting text.

158: Both Transport Scotland and the North East of Scotland Transport Partnership

(Nestrans) support the retention of this site for the future expansion of the rail freight facility. Aberdeen and surrounds are currently experiencing considerable growth, particularly in relation to employment land and the Council wishes this growth to continue. There are substantial opportunities to develop employment land elsewhere but nowhere else has been identified for rail freight expansion should it be required in future. In this context, it would be prudent to retain the current zoning of Land for Transport and retain the site as an opportunity for rail freight expansion. With regards to Aberdeen City Council ensuring there is a range of marketable allocated sites for businesses, the Proposed Plan has already allocated a significant amount of land for business and industrial development, in line with the Aberdeen City and Shire Strategic Development Plan 2014 (CD12). This land is located in a wide range of mixed use developments that support Class 4, 5 and 6 uses, as well as single-use business parks. The employment land allocations required by the Strategic Development Plan are set out in Figure 6 of the SDP. This requires the Aberdeen Local Development Plan to allocate 105 hectares of employment land to 2026 and a further 70 hectares of Strategic Reserve Land for the period 2027-35. Table 2 of the Proposed Plan (on page 9) shows that we have allocated 143 hectares to 2026 (it reads 130 hectares which is an error addressed by the Council as a Non-Notifiable Modification (CD26)) and a further 66 hectares to 2035. We therefore consider that the employment land requirements of the Strategic Development Plan have been fully met and that there is ample opportunity to develop storage and distribution facilities.

Policy T2: Managing the Transport Impacts of Development

General Support

153, 158: Support has been welcomed and noted.

Consultation

115: Aberdeen City Council undertakes consultation with relevant appropriate Key Agencies during the Masterplanning, pre-application and planning application stages when the details of the proposed development have been further investigated.

Increased Traffic

136: The existing Prime Four business development has been very successful, with exceptional demand for office space within its location. The issue of traffic as a result of the business park's development was examined during the planning application process. Consultation with Aberdeen City Council's Roads Projects Team was undertaken. Moreover, a Transport Statement and Travel Plan were submitted as part of the planning application process. Where a development proposal could lead to a significant increase in road traffic, a worsening of air quality or potential sources of pollution, it will not be permitted unless it can be demonstrated that measures will be implemented to minimise or manage the impacts to an appropriate level. The suggestion to carry out a walkable neighbourhood analysis has been noted.

City Centre Car Parking

158: Easy access to the City Centre Retail Core by sustainable transport modes and careful consideration of the balance and location of car parking is crucial to minimising traffic. The city centre is highly accessible by public transport and the density of population relative to the mixture of land uses (retailing, employment, etc.) allows for a large proportion of pedestrian and cycle journeys. Availability of on-street parking, public off-street parking, public transport hubs and Park and Ride opportunities are also available. These factors therefore allow for low levels of parking associated with new and existing developments within the city centre, such as Union Square. The recently approved City Centre Masterplan and Delivery Programme (CD33) promotes the improvement of sustainable transport and limiting the movement of private vehicles in the city centre. This includes applying stricter parking standards within the city centre boundary to enforce 'zero parking' for new developments as additional parking encourages trips by car and will exacerbate traffic problems in the area. Any forthcoming planning application to extend Union Square will therefore be considered within this strategic context. If a requirement for additional car parking is established and can be accommodated by the network this this will be considered on a cumulative and strategic basis for the North Dee and Union Square area as per the Transport, Air Quality and Noise Supplementary Guidance (CD25) where demand for car parking is at different times of the day/ year.

Policy T3: Sustainable and Active Travel

General Support

59, 139, 153: Support has been welcomed and noted.

Developer Contributions

66: The Proposed Plan supports the provision of necessary infrastructure to maximise the use of sustainable transport modes. In line with paragraph 273 of Scottish Planning Policy (SPP) (CD05), where public transport services required to serve a new development cannot be commercially provided, Aberdeen City Council works with the developers to seek an appropriate contribution towards an agreed level of service. Aberdeen City Council also coordinates discussions with public transport providers and developers in order to agree on a way forward. Aberdeen City Council does not subsidise unprofitable routes at present but would rather work with the North East of Scotland Transport Partnership (Nestrans) and public transport providers to ensure that commercial services are as attractive as possible to users (in terms of lower fares, improved journey times, reliability and frequency). By attracting more passengers to commercial services, operators will have the incentive and resources to improve and extend those services, thereby ensuring the long-term sustainability of the commercial network.

Sustainably Accessible Developments

115: Proposed Plan Policy T3 reflects the modal hierarchy set out in paragraph 273 of Scottish Planning Policy (CD05) and it also reflects the aims and objectives of the Consultative Draft Aberdeen Local Transport Strategy 2015 (Draft LTS) (CD34) on page 91, which sets out the framework for the transport network in the city. The Proposed Plan and the Draft LTS both prioritise the provision of a comprehensive

network for sustainable travel and the delivery of modal shift. Sustainable travel will be maximised through careful attention to the design and layout of development, giving priority to those on foot, cycling or using public transport ahead of car user requirements, and measures to improve infrastructure and services to encourage sustainable travel within the catchment area of the development. New developments will need to reflect the principles of Scottish Government's Designing Streets (CD06).

City Centre Connectivity

139: Aberdeen City Council recognises that high quality facilities that help to improve connectivity between the city centre streets and shopping centres are important. Proposed Plan Policy T3 encourages developments to be accessible by a range of transport modes, with an emphasis on sustainable transport. Retail developments in the city centre will therefore be required to provide convenient and safe access for people and will be required to integrate with existing transport networks. Any developments within the city centre will also be required to comply with Policy D1 – Quality Placemaking by Design, which states that proposals will be assessed against six essential qualities: (i) distinctive; (ii) welcoming; (iii) safe and pleasant; (iv) easy to move around; (v) adaptable; and (vi) resource efficient. In addition to this, the City Centre Masterplan and Delivery Programme promotes a range of projects that will enhance the public realm and strengthen the relationships between shopping areas and transport hubs. The projects, which include the Bon Accord Centre, St Nicholas Centre, Trinity Centre and Union Square, contain schemes that will retain open grid streets and promote pedestrian priority to improve the pedestrian environment. This will help to establish a strong pedestrian linkage between the shopping areas and the rest of the city centre.

City Centre Car Parking

139: The proposals for restricting levels of car parking only apply to new developments and, as such, are unlikely to have an impact on existing usage. Continuing to provide high levels of car parking in the city centre will encourage private vehicle use and therefore undermine Aberdeen City Council's aspiration to promote sustainable modes of transport. The city centre is one of three Air Quality Management Areas (AQMAs) in Aberdeen, where the volume of particulate matter (PM) detected, which is largely caused by the presence of motor vehicles, is of a level that could be harmful to human health. The city centre is currently highly accessible by walking, cycling and public transport and a number of proposals within the City Centre Masterplan and Delivery Programme should further improve accessibility by non-car modes of transport in future years. The City Centre Masterplan and Delivery Programme promotes a 'walkable Aberdeen', where the number of private cars is limited and the city is made more attractive and safer for pedestrians. Furthermore, the City Centre Masterplan and Delivery Plan also contains projects that include applying stricter parking standards within the city centre boundary to enforce 'zero parking' for new development.

Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	POLICY T4 & T5: AIR QUALITY AND NOISE	24
Development plan reference:	Page 38-40	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr John Findlay of Ryden LLP on behalf of Dandara LLP (90)
Mr Ross Anthony of The Theatres Trust (92)
Mr George Wood of Old Aberdeen Community Council (100)
Ms Jyll Skinner of Aberdeen Cycle Forum (115)
Clare Pritchett of Scottish Environment Protection Agency (124)
Miss Jennifer Woods of NLP Planning on behalf of British Airways (153)

Provision of the Development Plan to which the issue relates:	Presumption against developments that will have a negative impact on amenity and/or air quality

Summary of the representation(s):

Policy T4: Air Quality

General Support

124: Support Policy requiring an Air Quality Impact Assessment.

Air Pollution Reduction

100: Traffic based air pollution can only be improved with free flowing traffic and a reduction in traffic movements, especially single occupancy cars.

115: Air quality and noise are unaffected by cycle modal share and would contribute towards lowering the air and noise pollution, particularly in the city centre.

Policy T5: Noise

General Support

92: Supports Policy

153: Supports Policy requirement stating that housing and other noise sensitive developments will not normally be permitted close to existing noisy land uses.

Flexibility

90: Policy needs a flexible approach reflecting individual site and locational circumstances. Policy wording is ambiguous and does not reflect PAN 1/2011: Planning and Noise, which advocates a flexible approach where the level of detail

should be balanced against the degree of risk.

Future Conflicts

92: New developments should recognise that cultural and business uses such as theatres and pubs often create noise. Therefore the design of new developments near these sites should address this issue to ensure no future conflicts. Existing uses should not have unreasonable restrictions put on them at a later stage as a result of changes nearby since they were established.

Noise Pollution Reduction

115: Noise and air quality are unaffected by cycle modal share and would contribute towards lowering the air and noise pollution, particularly in the city centre.

Modifications sought by those submitting representations:

Policy T5: Noise

90: The term 'significant mitigation' should be amended to remove the word 'significant' as it is inappropriate and unnecessary.

Summary of response (including reasons) by planning authority:

Policy T4: Air Pollution

General Support

124: Support is welcomed and noted.

Air Pollution Reduction

100, 115: Air quality problems in Aberdeen are predominantly a result of emissions from road vehicles and this is reflected in the locations of the Air Quality Management Areas (AQMAs). The declared AQMAs are:

(i) City Centre (including Union Street, Market Street, Commerce Street, Guild Street and Bridge Street, and parts of Holburn Street, King Street and Victoria Road);
(ii) Anderson Drive (incorporating the whole of Anderson Drive, the area around the Haudagain roundabout and the A96 to Howes Road); and,
(iii) Wellington Road (from Queen Elizabeth II Bridge to Balnagask Road).

The Aberdeen Air Quality Action Plan (CD37) recommends a range of initiatives to address air quality problems, which include increasing awareness of air quality

issues, promoting sustainable transport, reducing the need to travel, improving traffic management and transport infrastructure, and consideration of the impact of a Low Emission Zone. A subsequent study to appraise the different scenarios of the Air Quality Action Plan ranked their impact on predicted emission reductions and this concluded that no intervention measure alone could address the air quality problems in Aberdeen; a combination of measures will be required (that will include free flowing traffic, reduction in traffic movements and cycle infrastructure)

Policy T5: Noise

General Support

92, 153: Support is welcomed and noted.

Flexibility

90: Policy T5 and relevant Proposed Supplementary Guidance: Noise, was prepared with PAN 1/2011 Planning and Noise (RD25) as a guide and is considered to be in alignment with national advice. PAN 1/2011 provides advice on the role of the planning system in helping to prevent and limit the adverse effects of noise. The flexible nature of this Policy is reflected in that it advocates Noise Impact Assessments (NIA) to be carried out only for development proposals that are likely to generate significant noise. This also includes proposals that may affect noise sensitive receptors or affect noise levels in and around a Noise Management Area (NMA) or Quiet Area (QA), or where a noise-sensitive development is proposed which may be affected by existing noise sources. The Policy also makes comment on the protection of QAs and NMAs. Aberdeen City Council appreciates the fact that the location and design of a development plays a significant role in preventing, controlling and mitigating the effects of noise. Early discussions with the Council will therefore help to determine the suitability of the site for a proposed development and the level of detail required from an applicant in respect of noise. With reference to the term ‘significant mitigation’ we agree that there may be instances where the term ‘significant’ would be inappropriate. Therefore, if the Reporter is so minded we would propose that the word ‘significant’ is removed from the second paragraph of Policy T5 – Noise.

Future Conflicts

92: The location and design of any new development plays a significant role in preventing, controlling and mitigating the effects of noise. Aberdeen City Council’s preferred approach is to plan for good environmental quality, including the noise climate, from the outset of a proposed development, rather than to try to mitigate the effects in retrospect. Good environmental quality remains an aim of the Council irrespective of existing neighbouring uses.

Noise Pollution Reduction

115: Aberdeen City Council acknowledges that cycling does not contribute towards noise and air pollution and therefore contributes to reducing this pollution when taken

in lieu of other forms of transport such as private cars.
Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	POLICY B1, B2 & B3: SUPPORTING BUSINESS AND INDUSTRY	25
Development plan reference:	Page 41-43, Proposals Map	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Malcolm Campbell of Knight Frank LLP on behalf of Moorfield Group Limited (94)
Mr Mike Williams of Scott Hobbs Planning on behalf of Scottish Enterprise (120)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Miss Jennifer Woods of NLP Planning on behalf of British Airways (153)
Mr Oliver Munden of Persimmon Homes (157)
Mr Fraser Littlejohn of Montagu Evans LLP on behalf of Buccmoor LP (160)

Provision of the Development Plan to which the issue relates:	Ensure that business and industrial use is supported in the correct location

Summary of the representation(s):

Policy B1 - Business and Industrial Land

General Support

153: Supports the identification of land for Class 4, 5 and 6 uses. Supports the safeguarding of existing industrial and business land from other development pressures, which is particularly important for sites in strategic locations.

Flexibility of Policy

160: Facilities that directly support business uses may be permitted where they enhance the attraction and sustainability of such areas.

Separation of Uses

136: It is better to have areas that contain a mix of uses, rather than separate commercial uses from residential using buffer zones. Single use business and industrial areas have proliferated around the city in recent years (e.g. at the airport, Kingswells, Murcar), which encourage additional car trips to and from work. These sites are often low density, which negatively impacts the landscape. Higher density development should be encouraged.

Employment Land on Allocated Sites

157: New sites allocated for employment use, where evidence shows there is no developer interest for employment development, should be allowed to be developed for alternative use. There should be more pressure to re-use existing business allocations first, rather than delivering on new allocations.

Impact of Airport

153: Notes the constraints that airport operations impose on new developments. These are noise standards, airport safeguarding areas and Circular 08/2002 guidance.

Policy B2 - Specialist Employment Areas

General Support

120: Supports provision of generous land for employment and economic growth, and the retention and promotion of land for knowledge-driven industries.

Flexibility of Policy

120, 160: Policy should be flexible enough to accommodate other uses within areas identified as B2, where they are ancillary to the prime Class 4 use. For example, Class 4, 5 and 6 uses are often required to be located on the same site.

94: Policy should have more flexibility in order for the Energy Park to grow. Policy is in conflict with recently granted consent for the Energy Park extension which allows Class 4,5 and 6 uses.

Scottish Enterprise Involvement

94, 120: Paragraph 3.62 is not accurate. Buccmoor LP now controls Aberdeen Energy Park. Scottish Enterprise no longer have involvement at the Energy Park.

Impact of Airport

153: Supports complementary employment uses in OP19. Part of the site however, falls within the Aberdeen Airport Public Safety Zone. Respondent notes the constraints that airport operations impose on new developments. These are noise standards, airport safeguarding areas and Circular 08/2002 guidance.

Policy B3 - West End Office Area

General Support

120: Supports policy and paragraph 3.63. Implementation should be positive for office development, and avoid imposing constraints on development.

Type of Use

136: Both residential and commercial uses should be encouraged to remain in the area, to retain vitality during times when the offices are not occupied. This area of Aberdeen should remain mixed use, both residential and commercial uses.

Modifications sought by those submitting representations:

Policy B1: Business and Industrial Land

Flexibility of Policy

160: Flexibility should be introduced into the Policy, so that proposals for alternative uses on sites identified for Business and Industry are considered on their own merits.

Employment Land on Allocated Sites

157: Policy should have similar wording for new allocations as the Plan already has for existing business use land (with respect to alternative uses being permitted where there is no developer interest in employment land).

Policy B2: Specialist Employment Areas

Flexibility of Policy

120: Modify the wording of the Policy so that Class 5 and/or Class 6 uses will be permitted where required to facilitate the Class 4 development. Wording should also be included to state that Class 5 and 6 uses will only be considered if it can be shown that respective uses can co-exist without eroding amenity.

160: Flexibility should be introduced into the policy that allows proposals for appropriate alternative uses in areas of Specialist Employment to be considered on their own merits.

Scottish Enterprise Involvement

94, 120: Remove the following sentence “the parks are an essential component of Scottish Enterprise’s Economic Development Strategy”. Update all other references in the Plan.

Policy B3: West End Office Area

General Support

120: Modify the wording of the Policy so that proposals for Change of Use to residential, or any new residential development, will be approved provided it can be demonstrated that the proposed residential use will not harm any existing or future potential for office use in the area.

Summary of response (including reasons) by planning authority:

Policy B1: Business and Industrial Land

General Support

153: Note the support received for the Policy.

Flexibility of Policy

160: The Policy states that facilities that directly support business and industrial uses may be permitted where they enhance the attraction and sustainability of the city's business and industrial land.

Separation of Uses

136: The Proposed Plan has allocated significant amount of land for business and industrial development, in line with the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) and as discussed under Issue 1 Vision and Spatial Strategy. Some of this land is located within new mixed use developments as well as single-use employment land allocations. However it is sometimes necessary to maintain an appropriate separation of business/industrial/commercial uses and residential uses, in the interests of residential amenity in terms of noise, traffic impacts, smell or other nuisance.

Employment Land on Allocated Sites

157: The SDP requires the Aberdeen Local Development Plan to maintain a ready supply of employment land in the right places. Therefore in accordance with the SDP, a phased large allocation of employment land has been identified to meet the diverse needs of different types and sizes of businesses. It is important that larger development sites contain a mix of employment land and other uses, in the interests of creating sustainable, mixed communities.

Impact of Airport

153: The Proposed Plan notes the constraints that airport operations impose on new developments. Policy B4 in the Proposed Plan deals specifically with matters relating to safety and developments within the airport's operational area.

Policy B2: Specialist Employment Areas

General Support

120: Note the support received for the Policy.

Flexibility of Policy

94, 120, 160: The aim of Proposed Policy B2 is to encourage development that contributes to a high quality environment, and it is considered that Class 5 and 6 uses would be likely to compromise this. The Plan already identifies areas as Policy

B1, where Class 4, 5 and 6 uses are supported. Policy B2 does state that facilities that directly support business use may be permitted where they enhance the attraction and sustainability of the Specialist Employment Area.

94: With regards to the comment about Policy B2 being in conflict with the recently granted consent for Aberdeen Energy Park, the planning application (131483) limited Class 6 uses to 20% of the site area. The 20% limit was set in order to preserve amenity levels and to ensure an appropriate focus and high standard of development within the Aberdeen Science and Energy Park. Additional information concerning this site has also been provided in Issue 3.

Scottish Enterprise Involvement

94, 120: Aberdeen City Council appreciates that Scottish Enterprise no longer has involvement at the Aberdeen Energy Park. We would propose to remove the text ""The parks are an essential component of Scottish Enterprise's Economic Development Strategy" from paragraph 3.62 as a Non-Notifiable Modification (CD26).

Impact of Airport

153: The Proposed Plan notes the constraints that airport operations impose on new developments. Policy B4 in the Proposed Plan deals specifically with matters relating to safety and developments within the airport's operational area.

Policy B3: West End Office Area

General Support

120: The support for Proposed Policy B3 West End Office Area is welcomed. The Policy states that new developments that do not protect existing residential amenity will be refused.

Types of Use

136: Proposed Policy B3 makes it clear that the Council will encourage and promote the continual development of this area as a high quality office location. The Policy further states that proposals for Change of Use to residential will be considered on their merits, but the main focus is to promote this area for office use.

Reporter's conclusions:

Reporter's recommendations:

ssue (ref and heading):	POLICY B4,B5 & B6: AIRPORT, HARBOUR, PIPELINES	26
Development plan reference:	Page 43-45, Proposals Map, Constraints Map	

Body or person(s) submitting a representation raising the issue (reference no.):

Julian Austin of amec foster wheeler E &I UK on behalf of National Grid (12)
Mr John Handley of John Handley Associates Lts on behalf of Shell UK Limited (38)
Mr Sacha Rossi of NATS Safeguarding Office (42)
Mr Roger Laird of Archial Norr on behalf of BP Midstreams Pipelines (108)
Mr Mike Williams of Scott Hobbs Planning on behalf of Scottish Enterprise (120) Mr Colin Lavety of Barton Willmore on behalf of Aberdeen Harbour Board (137) Miss Jennifer Woods of NLP Planning on behalf of British Airways (153)

Provision of the Development Plan to which the issue relates:	Support growth and development at the harbour and airport, and ensure developments follow safety procedures for pipelines, major hazards and explosives storage sites

Summary of the representation(s):

Policy B4 - Aberdeen Airport

General Support

42: Supports inclusion of Perwinnes Radar in the Policy.

120: Supports protection of land within the vicinity of Aberdeen Airport for employment use and also supports measures to seek delivery of the necessary infrastructure to facilitate economic development.

Safeguarding and Public Safety Zones

120: Policy doesn't provide sufficient clarity in relation to Safeguarding Zones. Aberdeen City Council should continue discussions with NATS to remedy this.

153: Supports inclusion of Public Safety Zones and the safe operation of the Airport. The Council should not allow an increase of population in these Zones and future neighbouring development must be fully assessed.

Wind Turbines

42: The NATS information pack for wind turbine applicants should be referenced.

Promoting Economic Growth

120: The Local Development Plan needs to have a more proactive, positive framework highlighting the importance of employment land allocations adjacent to Airport.

Supporting Airport-Related Uses

153: Supports presumption in favour of compatible uses within areas zoned for Aberdeen Airport. There should also be a presumption in favour of airport-related uses such as hotels and car hire facilities, which have an important role to play in supporting airports.

Policy B5 - Aberdeen Harbours

General Support

120, 137: Welcomes the Policies and proposals which support Harbour operation, development and expansion, and the continued recognition of its role as an economic driver.

Economic Development

120, 137: The Plan does not give sufficient priority to the potential of the harbour to contribute to the economic development of the Region.

120: Measures should be introduced for the delivery of necessary infrastructure to facilitate the Harbour expansion.

Reference to Nigg Bay in Policy

120: Revised wording and/or new Policy regarding the proposed harbour expansion should indicate how the wider area beyond Nigg Bay could benefit from a Masterplan.

Protection of Harbour Operations

137: Paragraph 3.70 makes reference to the Aberdeen Harbour Development Framework, stating that the Development Framework explores how a greater mix of uses can be accommodated at the Harbour. In fact, the Framework affords varying degrees of protection to Harbour operations dependent on the proximity of new developments to the operational Harbour.

137: In its present wording, Policy B5 appears to indirectly promote amenity of new development over Harbour activity and safeguarding.

Extent of B5 Allocation at OP62 Nigg Bay

137: Harbour proposals for Nigg Bay have evolved, and the proposed Harbour footprint is now different to that of National Planning Framework 3 and the Proposed Plan. Land zoned under Policy B5 should be subject to further adjustment, taking

into account these changes. The draft Harbour Revision Order Boundary Plan shows the most up to date site layout.

The 'Developed' and 'Undeveloped' Coastal Management Area's have been drafted the wrong way round. The Core Path will need to be diverted around the new Harbour.

Policy B6 - Pipelines, Major Hazards and Explosives Storage Sites

General Support

38, 108: Support Policy and identification of various Pipeline Consultation Zones. Wording is appropriate and Constraints Map is supported.

MAH Pipelines

12: High Pressure Major Accident Hazard Pipelines (MAHP) should be taken into account when developing site options.

Modifications sought by those submitting representations:

Policy B4 - Aberdeen Airport

Promoting Economic Growth

120: Policy should include expanded wording or include additional Policy for Airport Employment Growth Zones, making cross references to other policies in the Plan.

Safeguarding and Public Safety Zones

120: Amend Policy wording and supporting text to provide greater clarity in relation to safeguarded zones requirements.

Policy B5 - Aberdeen Harbour

Protection of Harbour Operations

137: The Local Development Plan should make reference to the Objective Area of the Harbour Development Framework and should make clear that the maintaining the Harbour's viability is of paramount importance and will take precedence over potentially conflicting developments.

Extent of B5 Allocation at Nigg Bay

137: Policy B5 allocation at Nigg Bay should be amended to reflect accompanying draft Harbour Revision Order boundary plan.

The legend on the Additional City Wide Proposals Map should use dark green and light green respectively to indicate 'Developed' and 'Undeveloped' Coastal Management Areas.

Economic Development

120: Expand wording or include additional Policy that is in favour of development or expanded harbour and associated employment land.

137: Reword Paragraph 3.69 to make reference to offshore energy first, rather than trade, offshore energy and passenger ferry service. Policy should be reworded to make the locations of new developments within the harbour's vicinity clear.

Summary of response (including reasons) by planning authority:

Policy B4 - Aberdeen Airport

General Support

42, 120: Note the support received for Policy B4 Aberdeen Airport.

Safeguarding and Public Safety Zones

120: Aberdeen City Council has continued discussions with National Air Traffic Services (NATS) regarding Safeguarding Zones for Perwinnes Radar. Detailed guidance on this subject is contained in the Technical Advice Note (TAN): Land Use Planning and Aberdeen Airport (RD43).

153: Comment on support of inclusion of Public Safety Zones is noted. Proposed Plan Policy B4 already notes that there is a presumption against certain types of development resulting in an increase of people living, working or congregating in Public Safety Zones.

Wind Turbines

42: Aberdeen City Council appreciates the fact that the NATS information pack for wind turbine development is important. Reference is given to this in the Proposed Wind Turbine Development Supplementary Guidance (CD25). It notes that NATS are a statutory consultee and are responsible for ensuring that all of their assets are protected from interference.

Promoting Economic Growth

120: Paragraph 3.57 of the Proposed Plan notes that business and industrial development sites can be located in strategic locations such as Aberdeen Airport. Furthermore, paragraph 3.65 also notes that the Airport is vital to the success of the North East economy. The Proposed Plan therefore recognises the importance of

employment land in in proximity to the Airport because of its strategic location and the ability to ensure Aberdeen remains competitive.

Supporting Airport-Related Uses

153: Proposed Plan Policy B4 deals specifically with matters relating to the safety and efficiency of Airport operations, and developments within the Airport's operational areas. The Policy makes clear that uses such as hotels and car-hire facilities that are airport-related, will be treated and judged on their merits during the planning application stage.

Policy B5 - Aberdeen Harbour

General Support

120, 137: The support received for Policy B5 Aberdeen Harbour is welcomed and noted.

Economic Development

120, 137: Paragraph 3.69 of the Proposed Plan makes reference to the Harbour's critical role in both Aberdeen and Scotland's economy. The expansion of Aberdeen Harbour has been established at a national level by the National Planning Framework 3 (CD04), on the grounds of strengthening its key role in supporting the economy of the North East. A new Development Framework for Nigg Bay is also being produced which will focus on the Harbour expansion and will address aspects such as environmental improvements, economic development regeneration, the co-ordination of essential infrastructure delivery and strategic improvements to the road and rail network.

Reference to Nigg Bay in Policy

120: Paragraph 3.72 of the Proposed Plan states that a Development Framework will be prepared and adopted as Supplementary Guidance for the new harbour at Nigg Bay and its surrounding area.

Protection of Harbour Operations

137: We consider the existing policy wording to be appropriate. It does not imply that the Proposed Plan privileges new development over harbour operations. The policy was written with the consideration and regard to the existing Harbour Development Framework.

Extent of B5 Allocation at Nigg Bay

137: As this issue relates to an Opportunity Site, OP62, it has been addressed separately in Issue 13 – Allocated Sites Loirston and Cove.

Policy B6 - Pipelines, Major Hazards and Explosives Storage Sites

General Support

38, 108: The support received for Proposed Plan Policy B6: Pipelines, Major Hazards and Explosive Storage is noted.

MAH Pipelines

12: Pipelines will continue to be protected through Proposed Plan Policy B6: High Pressure Major Accident Pipelines and will be used next time as part of the Sustainability Criteria for assessing new sites. They are already marked on the Proposed Plan Additional City Wide Proposals Map for consideration by Planning Officers when assessing development proposals.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY H1, H3 & H4: MEETING HOUSING AND COMMUNITY NEEDS	27
Development plan reference:	Page 46-47, Proposals Map	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr John Findlay of Ryden LLP on behalf of Dandara LLP (90)
Mr Anthony Aiken of Colliers International on behalf of MacTaggart and Mickel Homes (123)
Ms Christine Dalziel of Halliday Fraser Munro on behalf of CALA Homes (North) Ltd (131)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Mr Blair Melville of Homes for Scotland (149)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Miss Jennifer Woods of NLP Planning on behalf of British Airways (153)
Mr Oliver Munden of Persimmon Homes (157)
Ms Meabhann Crowe of Colliers on behalf of AA Webster and Sons (162)
Ms Meabhann Crowe of Colliers on behalf of MacTaggart and Mickel Homes and Mr Fabrizio Necchi (163)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Supporting residential development in the correct location, with appropriate density and housing mix, and supports mix use development in the correct location

Summary of the representation(s):

Policy H1: Residential Areas

Support for the Policy

123, 157, 162, 163: General support for the Policy.

Character Areas

123, 162, 163: Request for a description of the character areas and definition of what is meant by 'surrounding area'.

Development and the Airport

153: The Council must ensure that development permitted in close proximity to the airport complies with polices in the Plan relating to the safe and effective operation of Aberdeen Airport.

157: The lack of definition of 'over development' creates uncertainty in terms of

identifying sites. More clarity is required.

Alternative Sites

162: Proposal to include a site a Derbeth Farm.

163: Proposal to include a site a Bucksburn.

Policy H3: Density

136: Support for the Policy but urges caution in striking a balance between higher density developments and creating attractive places and that the Policy should be extended to office developments.

152: The density of a development should be determined by the site not a Policy.

Policy H4: Housing Mix

Support for the Policy and Lowering the Policy Threshold.

136: Support for the Policy and suggestion that it should apply to developments smaller than 50 units. The market should determine the mix.

85, 90, 183: Object to the Policy on the basis the market should determine housing mix.

90: A mix is not justified by the Housing Need and Demand Assessment and if housing is needed for elderly people and people with particular needs then contributions via the affordable housing policy should be used to deliver this.

131, 149,157: Object to the Policy on the basis that a site may be brought forward aimed at a particular market and the Local Development Plan should identify a particular mix if one is required.

157: It is not appropriate for any Planning Authority to predict house sizes - this is an issue for the market.

149, 157, 183: Object to the Policy on the basis that housing mix should be determined at settlement/city level rather than on a development basis as there is no clear definition of what a community is as set out in Scottish Planning Policy.

Modifications sought by those submitting representations:

Policy H1: Residential Areas

123, 157, 162: Set out clarifications regarding the character area descriptions - if

any exist - and what specific radius applies to 'surrounding areas'.

157: Request a definition of over development is included within Policy H1.

162: Include land at Derbeth Farm as a viable residential development location as identified in the supporting information.

163: Include land at Bucksburn as identified in the supporting information.

Policy H3: Density

152: Remove criterion 1 from Policy H3

Policy H4: Housing Mix

85, 90, 149: Policy should be amended to reflect that of the extant Local Development Plan

85, 90: The final sentence requiring the provision of smaller 1 and 2 bedroom units should be deleted. The supporting text in paragraph 3.79 should be amended to remove the emphasis on the needs of an ageing population.

85, 149: Amend the Policy - line 2 - replace 'achieve' with 'contribute to'; Line 3 - remove ' in line with a masterplan'; Line 3 after 'sizes' add 'within the wider community or neighbourhood'; Line 8 replace 'smaller 1 and 2 bedroom units' with ' a range of house sizes'.

183: Reword Policy to read: “Housing developments of larger than 50 units are required to contribute to an appropriate mix of dwelling types and sizes within the wider community or neighbourhood, reflecting the accommodation requirements of specific groups, in particular families, older people and people with particular needs. This mix should include a range of house sizes and should be reflected in both the market and affordable housing contributions.”

Summary of response (including reasons) by planning authority:

Policy H1: Residential Areas

Support for the Policy

123, 157, 162, 163: Support for the Policy is welcomed.

Character Areas

123, 162, 163: In the context of Policy H1 “character” and “surrounding area” do not refer to specific geographic areas, they relate to a development’s acceptability in the context of the surrounding built and natural environment. The sphere of influence of

any development will be determined by the Planning Case Officer on the basis of the scale of development, its location and the expected level of impact. Other Policies in the Proposed Plan such as Policy D1 – Quality Placemaking and Design will also play an important role in such an assessment based on the importance placed on Placemaking in Scottish Planning Policy (SPP) (CD05). One of the principal polices in SPP (paragraph 37) states that "Planning should take every opportunity to create high quality places by taking a design-led approach." As such it would not be practical to identify what type or style of development would be suitable in every area across the city and this may indeed discourage innovative development from coming forward. In all cases the opportunity to discuss possible new developments and the appropriateness of sites with a Planning Officer or the Local Development Plan Team, is available to all members of the public. This policy is carried forward from the extant Local Development Plan 2012 (CD42) with only one change. That change is the substitution of a reference to specific Supplementary Guidance with a reference to all Supplementary Guidance due to concerns that other guidance, not directly referenced, was not being considered.

Development and the Airport

153, 157: All development allocated in the area of the Airport have gone through a Development Options Assessment (CD28/29/30) and Strategic Environmental Assessment (CD27) prior to their allocation in the Proposed Plan. This development will also be required to go through the planning application process where all relevant Polices in the Plan, including those related to the Airport, will be used to assess the acceptability of such development. A Technical Advice Note (TAN) Land Use Planning and Aberdeen Airport (RD42), regarding development in and around the airport has also been prepared by the council. This TAN was prepared in consultation with the Airport Authorities and consultation bodies as highlighted in para 284 of Scottish Planning Policy (CD05) which notes that Planning Authorities, Airport Operators and other stakeholders should work together on issues relating to the Airport including safety. The purpose of this TAN is to provide developers with additional information in relation to safety at the Airport.

Alternative Sites

162, 163: Please see Issue 8 - Alternative Sites: Kingswells & Greenferns for a response to the proposal to include a site a Derbeth Farm. Please see Issue 6 – Alternative Sites: Dyce, Bucksburn & Woodside for a response to the proposal to include a site a Bucksburn.

Policy H3: Density

136: Support for the Policy is welcomed.

136, 152: Land is an extremely important and valuable resource and its efficient use is fundamental to a plan led planning system and our sustainable future. Higher density developments prevent the loss of valuable agricultural land and can reduce infrastructure costs associated with transport. They can also support the viability of business by providing additional footfall and support the provision of services within new communities. The efficient use of land is highlighted in Scottish Planning Policy

Para 40 where it notes that 'planning should direct the right development to the right place' and higher density development can support the creation of better places. It also notes that higher density development supports the principles of a low carbon place by reducing transport emission SPP Para 158. The Aberdeen City and Shire Strategic Development Plan 2014 (SDP) (CD12) reflects this by requiring new developments over one hectare to have 'generally no less than 30 dwellings per hectare' (page 37). This in turn has been included in the Proposed Plan in Policy H3. The Policy does however recognise that this must be done while having due regard to the character of the site and the importance of creating attractive residential environments. By providing a minimum density the Plan provides clear guidance to prospective developers of what is expected from each site. The density is also carried forward from the extant Local Development Plan 2012 (CD42).

136: The suggestion that office developments should be included within the Policy is noted. It has not been the Councils experience that office development proposals do not try to maximise the density available on developments sites. Creating a Policy on density that addresses all forms of Business and Industrial development would also be difficult due to the varied nature of the uses even within different development classes.

Policy H4: Housing Mix

Support for the Policy and Lowering the Policy Threshold

136: Support for the Policy is welcomed. The suggestion that the Policy should apply to developments smaller than 50 units has been considered. The provision of different unit types does have a financial implication on developers and it is felt that the economy of scale to achieve such variety is more appropriate at developments of 50 units or more.

Determining Housing Mix

85, 90 131, 136, 149, 157, 183: The population of Scotland is continuing to age with the group over 65 expected to be one of the fastest growing age groups. The Aberdeen City and Shire Housing Needs and Demand Assessment (HNDA) 2011 (CD14) identified that this group would grow to 35% of the population by 2030. Catering for this age group is therefore extremely important as it is the decisions we take now that will be felt by 2030. The SDP (CD12) reflects this and requires new developments to meet the needs of the entire community through 'an appropriate mix of types and sizes of homes' (page 37). Proposed Policy H4 does not set a prescribed mix - it simply requires that all developments over 50 units provide a mix of types including smaller one and two bedroom units. These are seen as particularly important as they satisfy two ends of the market. They provide an opportunity for young families to get started in the housing market and allow older people to downsize. By not setting a prescribed target the Policy provides the flexibility for the Masterplanning/planning application process to adapt to market trends. This supports Scottish Planning Policy's aim of supporting the creation of sustainable mixed communities.

Where sites are brought forward for specialist housing which is specifically identified

for one user group, such as housing for the elderly or student accommodation, the appropriateness of applying the Policy will clearly be considered as part of the determination of the application. The Policy is also carried forward from the extant Local Development Plan 2012 with the addition of the requirement to provide a mix of types including smaller one and two bedroom units.

Scottish Planning Policy does not determine what a community is as setting a 'one size fits all' definition to community would be impractical and even counterproductive. Regardless of what a community is considered to be, it is the aim of this Policy to provide a range of housing types in all developments over 50 units, as it is these developments which together or alone will build to form a community. The Policy provides the flexibility for the Masterplan or planning application to consider context when determining the appropriate level of mix. However the HNDA has shown a strong demand for all house types meaning that regardless of what scale is chosen, there will still be a demand for a range of house types and sizes. As noted above this Policy is carried forward from the extant Local Development Plan 2012 which had the same benchmark of 50 units.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY H5, H6 & H7: AFFORDABLE HOUSING, AND GYPSY AND TRAVELLER SITE PROPOSALS	28
Development plan reference:	Page 48-50,	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Ian Livingston of Ryden LLP on behalf of University of Aberdeen (63)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr John Findlay of Ryden LLP on behalf of Dandara LLP (90)
Ms Lavina C. Massie on behalf of Culter Community Council (98)
Mr George Wood of Old Aberdeen Community Council (100)
Mr Christopher Ross of Barratt North Scotland (125)
Ms Christine Dalziel of Halliday Fraser Munro on behalf of CALA Homes (North) Ltd (131)
Mr Dominic Fairlie of Aberdeen Civic Society (136)
Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148)
Mr Blair Melville of Homes for Scotland (149)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Mr Oliver Munden of Persimmon Homes (157)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Requirement for new development to provide affordable housing; and make provision for the development of Gypsy and Traveller Sites

Summary of the representation(s):

Policy H5: Affordable Housing

Requirements for Affordable Housing

85, 149: Affordable housing requirements must be realistic and take into consideration the Strategic Development Plan, affordable housing targets and the provisions of PAN 2/2010 - Affordable Housing and Housing Land Audits.

Wording and Scottish Planning Policy

85, 90, 125, 131, 152, 157, 183, 149: Object to the wording of the Policy on the basis it does not reflect the current Scottish Planning Policy (SPP) by setting a minimum level of 25% Affordable Housing, that it does not include reference to a reduction in this requirement in exceptional cases and that reference to benchmarking should also be removed as it is not included in SPP.

131: The 25% level may cause confusion where the result is not a whole number.

Development Viability and Flexibility

90, 157: The consideration of development viability should be set out in the Policy. It should be clear that viability is a significant consideration and that the affordable housing requirement should not jeopardise the overall delivery of a development.

157, 183, 149: The availability of funding is crucial to the delivery of affordable housing and this should be considered in setting targets.

90: Greater flexibility should be shown to the delivery of affordable housing including offsite delivery.

Thresholds

131, 90: The threshold of five units is below the figure set out in PAN 2/2010.

131: A suggestion that 10 units is more appropriate.

85, 90: The threshold for onsite delivery should be increased to 20-50 units. Active steps should be taken to support delivery

90: The Plan should allocate affordable housing sites including plots for self-build. Use compulsory purchase powers to support the delivery of greenfield and brownfield as well as making surplus Local Authority land or buildings available for affordable housing.

Key Workers and Universities

63, 148: Students and Key Workers (NHS Staff) should be identified as affordable housing.

63: The Universities should be allowed to retain affordable housing as on-site or off-site new or refurbished Student and Key Worker accommodation. The Council has been willing to accept this on Balgownie Farm.

148: Affordable housing on NHS sites should be ring fenced for NHS Key Workers.

Tenure

90: The Plan should give an indication of preferred tenures on sites.

Supplementary Guidance

149: There are Polices within the supporting Supplementary Guidance which should be within the Policy.

Commuted Payments

90: There should be wider use of commuted payments and they should not be

reviewed annually.

98, 136: Object to the acceptance of commuted payments, developers should deliver units.

149, 157: The Council should revert to the previous approach on commuted sums of a commuted sum based on transaction evidence in the market as this represents the values which both developers and Registered Social Landlord's find practical and viable.

Policy H6: Gypsy and Traveller Caravan Sites

100: Suggest that the delivery of Gypsy and Traveller Caravan Sites must be a priority.

Modifications sought by those submitting representations:

Policy H5: Affordable Housing

Wording and Scottish Planning Policy

85, 90: The term "no less than" should be removed from Policy as the wording does not reflect Scottish Planning Policy

131: Plan should be altered to read "a target of 25% of the total number of units".

125: "For market housing developments of five units or more, no more than 25% of the total number of units should be for affordable housing"

149: On housing developments of five units or more, a target of 25% of the total number of units should be affordable housing"

152: Delete "no less than" and insert "up to"

157: Request that the wording of Policy H5 is changed to replace "contribute no less than 25" with "approximately 25%"

183: It is proposed that the first sentence of Policy H5 be re-written as follows: "On housing developments of five units or more, the total number of affordable housing units should generally be no more than 25% of the total number of houses."

Development Viability and Flexibility

131: It should be made clear that the percentage requirement of affordable housing may be reduced as part of discussions but cannot be increased other than if the applicant proposes a greater provision than required by Policy.
Active steps should be taken to support delivery

85: Consideration should be given to the allocation of specific sites for affordable housing and in particular, surplus Local Authority owned land or buildings should be identified for affordable housing.

Supplementary Guidance

149, 157: The Council should revert to the previous approach on commuted sums of a commuted sum is based on transaction evidence in the market as this represents the values which both developers and Registered Social Landlord's find practical and viable.

149: The Reporters are requested to examine the Supplementary Guidance on Affordable Housing to determine which elements of the Supplementary Guidance are in fact Policy and therefore should be included in the Plan itself.

Key Workers and Universities

63: Students and Key Workers should be included within the definition of affordable housing: "where Universities or comparable institutions are providing new or up-dated accommodation for students or groups with similar characteristics, such provision may therefore be an acceptable alternative destination for affordable housing contributions from mainstream housing built on land owned by the institutions."

148: Additional paragraph should be added which states: "This meets the flexible approach to the delivery of affordable homes that Aberdeen City Council favour and more importantly understanding that there are distinct differences between affordable housing and key worker housing."

Summary of response (including reasons) by planning authority:

Requirements for Affordable Housing

85, 149: The Aberdeen City and Shire Housing Needs and Demand Assessment (HNDA) (CD14) was updated in 2011 to support the preparation of the Aberdeen City and Shire Strategic Development Plan 2014 (SDP) (CD05). The 2011 update of the HNDA was submitted to the Centre for Housing Market Analysis (CHMA) in March 2011 and the CHMA determined it to be 'robust and credible' on the 2nd of June 2011 (RD18). The SDP identified an affordable housing need of 38% across the Aberdeen Local Development Plan area, with the updated HNDA showing the Aberdeen Housing Market area need, standing at 40%. These figures show the scale of the challenge facing the city in terms of affordability pressure, and the chronic level of housing need.

The HNDA identified that that the figures were being driven by a decline in supply of affordable lettings, the difficult housing market and an increase in house prices

relative to income, at the low and modest end of the market. They also showed that the supply would likely continue to fall short of the demand and that a "combination of policy tools" would be required. The 40% demand clearly outstrips the 25% requirement identified in Proposed Plan Policy H5. However, as noted in paragraph 3.82 of the Proposed Plan, the provision of affordable housing should not jeopardise the delivery of housing as this would only compound the problem. The Plan and supporting Proposed Supplementary Guidance 'Affordable Housing' (CD25) therefore aim to create a broad flexible policy approach that can deliver the maximum level of affordable housing, while recognising the financial pressure on development. The Policy is therefore set at 25% of units for sites over five units to support both the delivery of affordable housing while recognising these financial pressures. The Proposed Supplementary Guidance on Affordable Housing, which has been consulted on separately, supports Policy H5 by setting out a broad range of approaches to the delivery of affordable housing.

This range of options includes different tenures types such as, social rent, shared ownership, shared equity, discounted low cost sale, housing without subsidy and mid-market rented accommodation, as well as options for onsite, offsite and commuted payments. Other options such as housing without subsidy will also play a role and the Supplementary Guidance also includes an option to consider types of affordable housing which have not yet been identified.

Policy H5: Affordable Housing

Wording and Scottish Planning Policy

85, 90, 125, 131, 152, 157, 183, 149: In line with PAN 2/2010: Affordable Housing and Housing Land Audits (RD26), Policy H5 sets out a clear threshold for developments to provide "no less than 25% affordable housing". This is done to provide a clear and unambiguous requirement from each development. A prospective developer who allows for this level of affordable housing within their Business Plan can be confident that that this will satisfy the Council's requirement for affordable housing. Altering this requirement to "approximately" or "up to" would introduce an element of ambiguity from the outset and would not provide the clarity which the Planning Circular 6/2013: Development Planning (CD10) and PAN 2/2010 (RD26) aim to achieve. This 25% requirement is also in line with Scottish Planning Policy (CD05) which states in paragraph129 "contribution within a market site should generally be no more than 25% of the total number of houses". This is also reflected in the Strategic Development Plan which similarly has a target of "around 25%". Not withstanding the discussion in the previous paragraph, that the requirement for affordable housing in Aberdeen far outstrips the 25% requirement in the Policy, 25% has been set to ensure the viability of developments as stated in paragraph 3.82 of the Plan. This figure is also carried over from the extant Local Development Plan 2012 which also requires 25%, thereby providing consistency and certainty for the development industry.

Development Viability and Flexibility

90, 149, 157, 183: Affordable housing, like any obligation, cannot be considered in isolation and in line with PAN 2/2010 Affordable Housing and the Housing Land

Audit 2015 (RD26), paragraph 3.82 of the Proposed Plan states clearly that the provision of affordable housing should not jeopardise the delivery of housing. Therefore if there are constraints on-site, or the affordable housing requirement affects the viability of the development, it will be addressed through the individual planning application. The Policy is therefore clear in what is expected, “no less than 25% affordable housing”, but flexible in order to deal with individual site circumstances. The supporting Proposed Supplementary Guidance ‘Affordable Housing’ (CD25) also provides a range of delivery options to provide flexibility which can aid in this process, as well as details on what is expected from the application in order to prove that a development is unviable. A draft Viability Statement is also included within Proposed Supplementary Guidance. Paragraph 3.82 of the Proposed Plan discusses the importance of Scottish Government funding in providing affordable housing. This year (2015) funding has outstripped the availability of sites, but it nevertheless remains an important factor. To address this, a broad range of options are proposed in the supporting Supplementary Guidance, as outlined in the text below Policy H5 in the Proposed Plan. These options aim to ease the reliance on government funding and include the transfer of serviced land to the Council.

Thresholds

85, 90, 131: The threshold of five units or more has been set as many of the developments which come forward within the city are smaller brownfield sites or Change of Use developments. To set a target higher than five units would exclude a significant number of developments across the city, and place more reliance on larger developments which can often have significant other developer obligations. The viability of these smaller developments is nevertheless still taken into consideration and there is no requirement for such developments to deliver affordable housing on site. A commuted payment or alternative delivery mechanism can be considered for developments up to 20 units. In line with PAN 2/2010 (RD26) developments of 20 units and above are expected to deliver affordable housing on site. This is done on the basis that 25% of 20 units equates to five affordable units, a figure which would be effectively manageable for any form of affordable housing. Raising the threshold for onsite delivery from 20 to 50 would move away from one of the central tenants of Scottish Planning Policy, creating successful places through sustainable mixed communities. It would also run contrary to PAN 2/2010 which states that “Affordable housing should ideally be integrated into the proposed development and wider community”. These thresholds are also carried over from the extant Local Development Plan 2012.

Active Steps to Support Delivery

90: A number of sites across the city, which are in Council ownership, are being actively progressed with our Housing Team and a new dedicated housing joint venture. This joint venture is one of the mechanisms the Council is proposing to use to close the gap between the 40% identified affordable housing need and the 25% which Policy H5 seeks from private housing developments.

Alternative approaches such as compulsory purchase have not to date been necessary. However this is a mechanism that the Council has and will continue to

consider if it is unlikely that a site is going to come forward for development.

Finally, the identification of sites solely for the delivery of affordable housing is a more complex issue. While some smaller sites, particularly Council owned sites, are being progressed for affordable housing, it is not the Council's Policy to do this on a large scale. The allocation of sites purely for market or affordable housing does not support the Council's aims, or those of Scottish Planning Policy or the Strategic Development Plan, of creating sustainable mixed communities.

Key Workers and Universities

63, 148: Key Worker accommodation is recognised as a growing issue within Aberdeen. It impacts on the ability of a business to both attract and retain staff vital to the success of the region. A number of pilot projects within the city are currently underway and these projects will provide an evidence base which may inform future guidance, but at present no allowance for key worker accommodation has been included within the Housing Needs and Demand Assessment (CD14). These pilot projects will be considered under Categories of Affordable Housing (4) Other Options, within the Proposed Supplementary Guidance on Affordable Housing (CD25). This section identifies that there may be other methods of meeting housing need within the city and that these will need to be considered on an individual basis. The Proposed Supplementary Guidance therefore gives the flexibility to consider such methods. In the absence of an allowance in the HNDA or an evidence base from the pilot projects, it would be premature to form a policy at this stage. The housing needs of universities cut across both Key Worker accommodation, for certain academic and non academic staff, and the student population. Student accommodation is identified as Specialist Housing in Supplementary Guidance (CD25) and is exempt from the requirement to provide 25% affordable housing. To "ring fence" affordable housing requirements from NHS or University developments would not be practical. Unlike housing allocations, the future supply or scale of such development is unknown, as is the level of demand with no allowance made for key workers in the HNDA. Applications will however continue to be examined under the flexibility provided by the Supplementary Guidance and it is the Council's aim to support the NHS and Universities where possible.

Tenure

90: A wide selection of tenures is identified in the Proposed Supplementary Guidance - Affordable Housing and the appropriate tenure for a site is determined on a site by site basis. The preferred option as set out in the Supplementary Guidance is social rent but, as discussed earlier, funding can be an impediment. Other options such as Low Cost Home Ownership and mid market rent are becoming more popular and are also used to get a broader mix of tenures where there is demand. To set a tenure type for each site would be both difficult, due to the time frame for delivery on larger sites, and would impede the flexibility which both the Council and the development industry benefit from.

Supplementary Guidance

149: The review of Supplementary Guidance – Affordable Housing (CD25) is

subject to a separate consultation process, and is not subject to Examination. It is however accepted that the Policy on affordable housing and the supporting Supplementary Guidance are clearly linked and interrelated. The suggestion that the detail from the Supplementary Guidance should be included within the Policy is not supported. As stated earlier the Policy is clear in the requirement expected from all developments. The detail available within the Supplementary Guidance effectively identifies how that should be delivered or how the burden can be reduced by allowing for commuted payments, offsite delivery, different tenure types or indeed instances where viability may call into questions the level of affordable housing contribution. Circular 6/2013: Development Planning (CD10) is also clear that the purpose of Supplementary Guidance is to allow Plans to focus on Vision, the Spatial Strategy, overarching and other key policies and proposals, and allow supporting detail to be provided within Supplementary Guidance. In this case the policy clearly sets out the financial implications of the Policy, with the Supplementary Guidance detailing how the affordable housing can be delivered or how the overall level of contribution can be reduced.

Commuted Payments

90, 98, 136, 149, 157: Commuted payments are the least desirable option to the Council in terms of satisfying the requirements of Policy H5. There are however instances such as in developments of less than 20 units or developments where the 25% results in a fraction of a unit where commuted payments may be the only realistic option. They can also be used to cross subsidise the delivery of units where funding is a constraint. While the review of commuted payments is subject to a separate consultation process, and is not subject to Examination, it clearly cannot be considered in isolation.

The reason for reviewing the commuted payments on an annual basis is to ensure that payment sought is fair and equitable. It is not the desire of the Council to penalise the development industry if the value of land falls or jeopardise development delivery. But equally the Council must be able to use the commuted payment to purchase an alternative site where a development is not providing on site delivery of affordable housing. A commuted payment which does not allow the Council to purchase a comparable site on the open market would clearly not be equitable and any suggestion that affordable housing should be moved to areas where land process are lower would be contrary to the Scottish Planning Policy's and Strategic Development Plan's aim of creating sustainable mixed communities.

The annual review is to be undertaken by the District Valuers as set out in PAN 2/2010 and details of this will be consulted on as part of the Supplementary Guidance consultation process. An option is also being provided, where a developer disagrees with the commuted payment level for their development, to do an individual site valuation. The suggestion that the Council should revert back to the previous approach to commuted payments is not supported. The previous figure of £25,000 identified in Supplementary Guidance was not based on any evidence base and has remained unchanged for a considerable number of years. The suggested "transaction evidence in the market" is therefore based solely on the markets acceptance of this figure. It cannot be concluded by extension that this is an appropriate figure, only that it is a figure that the market is currently using for

affordable housing sites. The work which was undertaken by the District Valuers Office (RD19) to update these figures shows they were significantly out of date. In a market where the average house price currently stands at £223,291 in the City and £235,361 in Aberdeenshire (RD66), the figure identified in the Supplementary Guidance grossly undervalued the cost of land. As stated earlier, a commuted sum that does not allow the Council to secure a site on the open market is not fit for purpose and to provide flexibility, the option of an individual site valuation is being included where the applicant disagrees with the commuted sum.

Policy H6: Gypsy and Traveller Caravan Sites

100: The Council currently has three sites allocated within Masterplan Zones in the Proposed Plan, one of which, Loriston, has recently been granted planning permission, pending Section 75 legal agreement (141441). The Council will continue to support the delivery of Gypsy and Traveller Caravan Sites within these Masterplan Zones and outwith these Zones through Policy H6: Gypsy and Traveller Caravan Sites and the Proposed Supplementary Guidance - Gypsy /Traveller Sites (CD25).

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY NE1: GREEN SPACE NETWORK	29
Development plan reference:	Page 52, Proposals Map	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Nina Turner of Scottish Natural Heritage (54)
Mr George Wood of Old Aberdeen Community Council (100)
Mr Anthony Aiken of Colliers International on behalf of MagTaggart and Mickel Homes (123)
Clare Pritchett of Scottish Environment Protection Agency (124)
Mr Andrew Munnis of Montagu Evans LLP on behalf of M & G Real Estate (127)
Ms Meabhann Crowe of Colliers on behalf of AA Webster and Sons (162)
Ms Meabhann Crowe of Colliers on behalf of MacTaggart and Mickel Homes and Mr Fabrizio Necchi (163)
Mr Simon Pallant of Scottish Government Planning and Architecture Division (164).

Provision of the Development Plan to which the issue relates:	Provides protection for areas of Green Space and how it should be incorporated within new developments.

Summary of the representation(s):

Green Infrastructure

54: In line with national guidance on green infrastructure (Green Infrastructure, Design and Place-Making) there is a need to incorporate green infrastructure and integrate with wider green networks.

Policy Should be Fully Implemented

100: This Policy should be implemented fully in order to protect vital resources for the enhancement of the quality of life for residents.

Flexibility

123, 162, 163: The Council have failed to provide real scope within this Policy to allow for development to take place in tandem with enhancements to the Green Space Network.

162: Development of land at Derbeth Farm would not erode the character and funtion of the Green Space Network.

163: Development of the land at Bucksburn would not erode the character and function of the Network. Strong links can be provided within a development area thereby creating and enhancing wildlife corridors and extending the overall network.

Waterbodies

124: Welcome the identification of waterbodies as a Green Space Network component.

New River Dee Crossing

127: Transport Scotland are considering several options to add an additional crossing to the River Dee near Bridge of Dee. One option would require land at Garthdee Retail Park, which currently has a Green Space Network zoning.

Community Growing Spaces

164: Scottish Planning Policy states that Local Development Plans should encourage opportunities for a range of community growing spaces. The Proposed Plan, whilst making reference to allotments, does not refer to community growing, which includes community gardens, community orchards, community market gardens and community farms.

Unused or Underused Land

164: Scottish Planning Policy states that “Local development plans should encourage the temporary use of unused or underused land as green infrastructure while making clear that this will not prevent any future development potential which has been identified from being realised.” The Proposed Plan does not include text on temporary greening, to comply with this requirement of Scottish Planning Policy.

Modifications sought by those submitting representations:

Green Infrastructure

54: Amend Policy text to read: "Masterplanning/design... briefs for new developments should consider...Masterplans/design briefs will determine"

Flexibility

123, 162, 163: Wording to the following effect should be added to the Policy: "development proposals coming forward on designated Green Space Network sites may be appropriate where such development can be shown to enhance the network and connections therein."

163: Remove the Green Space Network designation at land at Bucksbum to allow for sensitive residential development to take place and green networks to be created and enhanced via a well-designed and appropriate landscape framework.

New River Dee Crossing

127: If the option of the Garthdee Retail site is progressed for the new bridge the Green Space Network designation for this area would need to be reviewed.

Community Growing Spaces

164: On page 52 of the Plan in paragraph 3.96 amend wording to read: "By encouraging connectivity between habitats, the Green Space Network helps to improve the viability of species and the health of previously isolated habitats and ecosystems. An extensive network of open spaces, together with path networks, will also encourage active travel and healthier lifestyles. Protecting and enhancing the Green Space Network will also provide opportunities to enhance the landscape of Aberdeen, improve biodiversity and amenity, provide community growing spaces, reduce the impact of flooding and help us mitigate, adapt to the effects of climate change and support successful placemaking."

On page 54 of the Plan include the following wording at paragraph 3.103 so that it reads: “This Plan aims to ensure that new open space provided as part of new development is functional, useful and publicly desired. For example it may take the form of naturalised areas, green corridors, play space, community growing space or allotments. Rather than provide minimum standards for open space based solely on quantity, requirements are also based on the quality and accessibility of open space."

Unused or Underused Land

164: An additional paragraph should be inserted into the Proposed Plan, on the following lines: "Temporary greening can be an appropriate way to create safe and attractive places prior to the development of sites. The Council will support the use of temporary greening of land awaiting development, where appropriate. Consideration will be given to whether greening of a site could bring about a positive impact to the local environment and overall amenity of the area, without prejudicing the effectiveness and viability of the site, if it is allocated for development in the longer term."

The appropriate location for this additional text could be either: - on page 52, in the section on the Green Space Network - after paragraph 3.95 which refers to enhancing green infrastructure networks ; or - after paragraph 3.98, which refers to opportunities for improvement and enhancement; or - on page 54, in the section on Urban Green Space - after the current paragraph 3.100, which refers to promoting and enhancing open space

Summary of response (including reasons) by planning authority:

Green Infrastructure

54: The Council’s view is that it is not necessary to add "design brief" to Policy NE1 as this is covered in the supporting Proposed Supplementary Guidance – Natural

Environment (CD25) on page 273.

Policy should be fully Implemented

100: We consider that the Policy wording is strong enough to enable Planning Officers to implement and enforce the principles effectively and in full.

Flexibility

123, 162, 163: The Green Space Network applies to land that offers significant value to Green Space Network features (habitat, landscape, recreation etc), or land that offers opportunities to link these areas, and therefore enhance their value further. The Policy seeks to protect, promote and enhance these areas. The Council does not feel it is appropriate to add wording that allows the character or function of the Green Space Network to be destroyed or eroded. It should be noted that the Green Space Network Policy is not a prohibitive policy but seeks enhancements, either on their own merits or as part of development opportunities.

162: Issues raised that relate specifically to the land at Derbeth Farm are covered in Issue 8.

163: Issues raised that relate specifically to the land at Bucksburn are covered in Issue 6.

Waterbodies

124: Support for the Policy is welcomed.

New River Dee crossing

127: The Bridge of Dee Study – Scottish Transport Appraisal Guidance (STAG) Report (CD39) is currently underway which will develop options to address the long term need for additional transport capacity across the River Dee. We note that consideration will need to be given to reviewing the Policy Zoning once a potential conclusion has been made and the project comes forward.

Community Growing Spaces

164: To ensure the Policy and supporting text is in accordance with Scottish Planning Policy, paragraph 227 (CD05) then, if the Reporter is so minded, paragraph 3.96 could be amended to read as follows (amendments in bold):

"By encouraging connectivity between habitats, the Green Space Network helps to improve the viability of species and the health of previously isolated habitats and ecosystems. An extensive network of open spaces, together with path networks, will also encourage active travel and healthier lifestyles. Protecting **and enhancing** the Green Space Network will also provide opportunities to enhance the landscape of Aberdeen, improve biodiversity and amenity**, provide community growing spaces**, reduce the impact of flooding and help us mitigate, adapt to the effects of climate

change **and support successful placemaking**."

The wording "community growing space" could also be added to paragraph 3.103.

Unused or Underused Land

164: There is a request to include text on temporary greening in order to comply with the requirements of Scottish Planning Policy. It is noted that the Proposed Plan was prepared before the publication of Scottish Planning Policy 2014. If the Reporter is so minded the following text could be added after paragraph 3.95:

"Temporary greening can be an appropriate way to create safe and attractive places prior to the development of sites. The Council will support the use of temporary greening of land awaiting development, where appropriate. Consideration will be given to whether greening of a site could bring about a positive impact to the local environment and overall amenity of the area, without prejudicing the effectiveness and viability of the site, if it is allocated for development in the longer term."

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY NE2: GREEN BELT	30
Development plan reference:	Page 53, Proposals Map	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr William Sell of Craigiebuckler and Seafield Community Council (66)
Mr John Findlay of Ryden LLP on behalf of Mr Russell Balsillie and Family (95)
Mr Anthony Aiken of Colliers International on behalf of MacTaggart and Mickel Homes (123)
Mrs Theresa Hunt of Burness Paull LLP on behalf of Mr Ian Suttie (133)
Mr Bob Reid of Halliday Fraser Munro (144)
Mr Fraser Littlejohn of Montagu Evans on behalf of E Yule Esq PER Kennedy Consultants (161)
Ms Meabhann Crowe of Colliers on behalf of AA Webster and Sons (162)
Ms Meabhann Crowe of Colliers on behalf of MacTaggart and Mickel Homes and Mr Fabrizio Necchi (163)

Provision of the Development Plan to which the issue relates:	Sets out what development will be considered acceptable in the Green Belt

Summary of the representation(s):

Policy should be more Rigorous

66: The current Policy does not go far enough in preserving the Green Belt. The Council should be as rigorous as possible in protecting the Green Belt.

Policy is Restrictive and Does Not Reflect Scottish Planning Policy

95: During the preparation of the Proposed Plan no consideration was given to Green Belt boundaries. The previous Green Belt Review that was undertaken in preparation of the Local Development Plan 2012 was relied upon even though it no longer fully reflected Scottish Planning Policy, which now takes a more relaxed approach. The Land at Murtle Den has the potential to accommodate development without detriment to the immediate areas or the wider setting. Removing it from the Green Belt would create scope for additional development without coalescence between Bieldside and Miltimber. The Green Space Network Policy also provides an additional layer of control and can be maintained notwithstanding the removal of Green Belt.

123, 162, 163: The wording of Policy NE2 only partially reflects Scottish Planning Policy, including the requirement for the planning system to be "flexible enough to accommodate changing circumstances and allow the realisation of new opportunities." Policy NE2 does not contain sufficient flexibility to respond to changing circumstances. The current wording is too stringent and acts as a barrier to

development in areas where Green Belt designations are no longer appropriate.

162: Land at Derbeth Farm, where the designation of Green Belt is not in accordance with the overall thrust of the Scottish Planning Policy. This site is a suitable location to absorb development.

163: In relation to the land at Bucksburn, the designation of Green Belt is not in accordance with the overall thrust of the Scottish Planning Policy in relation to appropriateness, expansion of the settlement or boundary markers.

Parklea House, Pitfodels

133: The Proposed Plan identifies Parklea and all land to the rear and east of the house under Policy H1. However, the formal garden ground of Parklea and the related land to the east is covered by the Policy NE2 Green Belt. A Landscape and Green Belt Appraisal of the garden ground of Parklea has been carried out which shows the garden ground does not meet any principles of the Green Belt policy such as to warrant retention of that designation. It demonstrates the removal of the Green Belt designation from Parklea will (1) not affect the important characteristics of the landscape setting of Aberdeen; (2) create a more defensible road boundary to the Green Belt by using an existing road - Baird's Brae and (3) rationalise the Green Belt in this location to reflect the local characteristics of the area.

Lack of Guidance on Sub-Division of Curtilages for Properties in the Green Belt

144: There is a discrepancy between Council advice given to householders in the Green Belt compared to those outside the Green Belt. The Supplementary Guidance on the Sub-Division and Redevelopment of Residential Curtilages is a useful document which sets out guidelines for judging proposals of this nature. It sets a presumption in favour of allowing plot subdivisions provided households meet the criteria. However this only applies to property outside the Green Belt. This is unfair and a contravention of the Human Rights Act 1998. There would have to be a significant and over-riding public interest reason to deny householders their right to sub-divide a plot. Provided the terms of the plot subdivision policy are adhered to, this type of development does not threaten the purpose of the Green Belt.

Small Scale Developments

161: An alternative approach to allowing small-scale development in the Green Belt would be to amend Policy NE2 to allow for appropriate infill development in urban fringe locations. The Policy as currently drafted allows for extensions of existing buildings and replacement on a one-for-one basis. However, such extensions or replacements can often have a greater impact over the development of plots than sensitive infill development. Sensitive infill development within suburban areas can play an important role in providing new homes within existing communities and sharing many of the sustainability credentials that that brings including access to services and communication links.

Modifications sought by those submitting representations:

Policy is Restrictive and does not reflect Scottish Planning Policy

95: The Green Belt zoning between Bieldside and Milltimber should be removed and rezoned as an existing residential area under Policy H1.

123, 162, 163: There should be more flexibility in the Green Belt policy to better reflect Scottish Planning Policy.

162: The Green Belt boundary should be reviewed to exclude land at Derbeth to create a stronger boundary in line with the Aberdeen Western Peripheral Route.

163: The Green Belt boundary should be reviewed to exclude land at Bucksburn to create a stronger boundary between the built form and the Green Belt beyond.

Parklea House, Pitfodels

133: The use of the Green Belt policy is not required or justified and conflicts with Scottish Planning Policy which requires the Council to critically review the Green Belt boundaries as part of the Local Development Plan process.

Lack of Guidance on Sub-Division of Curtilages for Properties in the Green Belt

144: The Green Belt Policy should be amended to make possible plot subdivisions within the Green Belt, provided they comply with the criteria set out in the Supplementary Guidance.

Small Scale Developments

161: Amend the Green Belt Policy to allow for appropriate infill development in urban fringe locations.

Summary of response (including reasons) by planning authority:

Policy should be more Rigorous

66: The function of Proposed Plan Policy NE2 is to maintain the distinct identity of Aberdeen and the surrounding areas by clearly defining their boundaries. The Policy safeguards Green Belt land to help avoid coalescence of settlements and sprawling development on the edge of the city, maintaining Aberdeen's landscape setting and providing access to open space. It also directs development to the most appropriate locations such as allocated sites and brownfield sites in the urban area. The Policy offers a strong enough protection of the Green Belt from inappropriate development

in line with paragraph 52 of Scottish Planning Policy (SPP) (CD05).

Policy is Restrictive and Does Not Reflect Scottish Planning Policy

95, 123, 162, 163: The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed to not allocate additional greenfield land over and above that already identified in the Aberdeen City and Shire Structure Plan of 2009 (CD20), and the decision to roll over the allocations into the current SDP was accepted by the Reporter during it's Examination (CD13). Because of the very limited scope of additional greenfield land release (over and above that already identified in the extant Aberdeen Local Development Plan 2012), the Council did not consider that a review of the Green Belt or Green Space Network was necessary during the preparation of the Proposed Plan. SPP does not contain an automatic requirement to review green belt boundaries, but only when deemed necessary by the Planning Authority (paragraph 50).

Scottish Planning Policy paragraph 52 sets out the type and scale of development that may be appropriate within the Green Belt. New build residential development is not considered to be appropriate. Proposed Plan Policy NE2 Green Belt complies with this stance.

With regards the land at Murtle Den, the site contributes to the landscape setting of the area and should remain as Green Belt. Please see Issue 12 Alternative Sites in Deeside for a further site specific response on this site.

With regards the Derbeth Farm site, the current Green Belt boundary of the Kingswells bypass is both appropriate and easily identifiable. This site should remain as Green Belt. Please see Issue 8 Alternative Sites in Kingswells and Greenferns for a site specific response for this site.

With regards the land at Bucksburn Primary School, the Green Belt boundary is defined by the edge of Bucksburn School and the single track lane to the east. This provides a clearly identifiable and robust boundary. Allowing development on the land to the South of the School would weaken this defensible boundary. The site should remain as Green Belt. Please see Issue 6 Alternative Sites in Dyce, Bucksburn and Woodside for a site specific response for this site.

Parklea House, Pitfodels

133: Parklea forms the western most boundary of the Green Belt on the north side of North Deeside Road and follows the pattern of development and therefore establishes a defensible Green Belt boundary. The Green Belt designation extends to the east and south of the site again reflecting the historic pattern of development of the area, therefore reflecting the local characteristics and maintaining the visual break between the city and Pitfodels. See Issue 12 Alternative Sites in Deeside for a site specific response on Parklea House.

Lack of Guidance on Sub-Division of Curtilages for Properties in the Green Belt

144: The sub-division of gardens and plots is not a Human Rights issue. There is no automatic right for anyone to carry out any development other than rights afforded under the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (CD03). All other development is subject to the requirement for planning permission and any such proposals should be considered against the Development Plan.

The aim of the Green Belt is to maintain the distinct identity of Aberdeen and the communities within and around the city, by clearly defining physical boundaries. The Green Belt directs planned growth to the most appropriate locations and supports regeneration. Some residential curtilages in the Green Belt are large and could accommodate much more than just small scale development and even a single house in the wrong location could have a significant impact in a largely rural setting. It would not be appropriate for the same guidance on the sub-division of curtilages to apply to properties within the Green Belt, and it would be inappropriate for the Green Belt Policy to allow for this. A general relaxation in policy in relation to sub-division of existing feus and new development within the curtilage of existing properties would permit the development of housing in the Green Belt which is not supported by Scottish Planning Policy.

Small Scale Developments

161: Policy NE2 allows for development to take place in the Green Belt on an exceptional basis. One of the reasons for having and safeguarding the Green Belt is to avoid coalescence of settlements and sprawling development on the edge of the city. This helps to maintain the individual identity of settlements, protect their landscape setting and provide access to open space. Allowing for infill development within the Green Belt, even areas classed as 'urban fringes' (of which, incidentally, there is no definition) would compromise these objectives of the Green Belt. It would also be contrary to paragraph 52 of Scottish Planning Policy which states clearly the types of development considered appropriate in Green Belt. It is therefore not considered appropriate to amend Proposed Plan Policy NE2 to allow for such developments.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY NE3 & NE4: EXISTING AND PROPOSED GREEN AND OPEN SPACE	31
Development plan reference:	Page 54-55, Proposals Map	
Body or person(s) submitting a representation raising the issue (reference no.):		
Ms Lorraine Jones of sportscotland (41) Mr John Findlay of Ryden LLP on behalf of Dandara LLP (90) Mr Andrew Munnis of Montagu Evans LLP on behalf of M & G Real Estate (127) Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148) Mr Simon Pallant of Scottish Government Planning and Architecture Division (164)		
Provision of the Development Plan to which the issue relates:	Provides protection for existing areas of greenspace and sets standards for the provision of open space	
Summary of the representation(s):		

Policy NE3: Urban Green Space

Scottish Planning Policy Reference to 'Outdoor Sports Facilities'

41, 164: Scottish Planning Policy refers to 'outdoor sports facilities' which includes playing fields, outdoor athletics tracks, golf courses, outdoor tennis courts and outdoor bowling greens. This is not reflected in Policy and does not give these spaces and facilities the policy protection expected by national policy.

NHS Provision

148: Some areas identified are incorrect. NHS Grampian land that is surplus to requirement has been prohibited for development.

River Dee Crossing

127: Transport Scotland are considering several options to add an additional crossing to the River Dee at Bridge of Dee. One of the options would require land at Garthdee Retail Park in order for the new crossing to be constructed.

Policy NE4: Open Space Provision in New Development

Open Space Provision

90: Object to open space requirement of 2.8 hectares per 1,000 people. Promotes a 'one size fits all' approach, contradicts other parts of the Policy and ignores the Open Space Audit.

Brownfield Sites

90: Distinction needed for brownfield sites in urban areas with reduced open space provision compared to greenfield.

Modifications sought by those submitting representations:

Policy NE3: Urban Green Space

Scottish Planning Policy Reference to 'Outdoor Sports Facilities'

41, 164: Make reference to 'Outdoor Sports Facilities' instead of 'playing fields/sports pitches' and include the Scottish Planning Policy definition of 'outdoor sports facilities' in the glossary. Part 7 of the Policy should read as follows: 'Proposals to develop Outdoor Sports Facilities, including playing fields and sports pitches, should also be consistent with the terms of Scottish Planning Policy'.

NHS Provision

148: Provision made within the Policy for the sensitive development of land within the NHS estate.

River Dee Crossing

127: If this option is progressed, Policy NE3 would need to be reviewed.

Policy NE4: Open Space Provision in New Development

Open Space Provision

90: Delete the requirement to provide at least 2.8 hectares per 1,000 people of meaningful and useful open space in new residential development.

Summary of response (including reasons) by planning authority:

Policy NE3: Urban Green Space

Scottish Planning Policy Reference to 'Outdoor Sports Facilities'

41, 164: Two respondents have requested that reference is made to the ‘Outdoor Sports Facilities’ term used within Scottish Planning Policy 2014 (CD05). If the Reporter is so minded, the point could be clarified within the Policy so that criterion 7 reads: "Proposals to develop Outdoor Sports Facilities, including playing fields and

sports pitches, should also be consistent with the terms of Scottish Planning Policy."

NHS Provision

148: Policy NE3 aims to safeguard areas of Urban Green Space from development, unless replacement provision is provided according to the criteria set out in the Policy. It is aligned with Scottish Planning Policy paragraphs 225-227 through seeking enhancement and promoting new spaces for a range of uses, such as green infrastructure, recreation, play, sports and allotments. The Policy allows for exceptions where an equivalent and equally convenient and accessible area for public use is laid out, therefore, the Council does not consider there a need to provide provision for the sensitive development of NHS land. Nor is it appropriate to amend established policy based on land ownership considerations. This issue was previously addressed during the Main Issues Report, in Issue 22 (RD40). The Policy wording was amended, from the extant Local Development Plan 2012, to improve clarity and ensure Planning Officers are able to implement it as intended.

River Dee Crossing

127: The Bridge of Dee Study – Scottish Transport Appraisal Guidance (STAG) Report (CD39) is currently underway which will develop options to address the long term need for additional transport capacity across the River Dee. We note that consideration will need to be given to reviewing the policy zoning once a potential conclusion has been made and the project comes forward.

Policy NE4: Open Space Provision in New Development

Open Space Provision

90: The Council does not consider the open space requirements to be a 'one size fits all' approach. The Proposed Open Space Supplementary Guidance, paragraph 8.4.3, (CD25) contains further information on Policy NE4, including the type of developments where the open space standards apply and explains that the level of necessary provision will be applied pro rata. Aberdeen's Open Space Audit 2010 (CD41) has identified a need for higher quality and more accessible open space and where it demonstrates that the minimum quantity of accessibility standards are met by existing provision, then raising the quality of that provision may be required instead. It is important to provide outdoor, recreational space for communities and it is for these reasons that minimum open space standards have been set for new development.

Brownfield Sites

90: The Proposed Supplementary Guidance on Open Space and Green Infrastructure (CD25), paragraph 8.4.4, contains details for open space requirements in brownfield development. It states that 'it may not always be appropriate to apply the minimum standards for open space to brownfield developments and that the Council may instead seek a contribution to off-site open space enhancements.' A distinction has already been made, therefore, the Council does not feel further

details are required.
Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	POLICY NE5 & NE8: NATURAL ENVIRONMENT	32
Development plan reference:	Page 56, 60, 61, Constraints Map	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Nina Turner of Scottish Natural Heritage (54)
Mr William Sell of Craigiebuckler and Seafield Community Council (66)
Clare Pritchett of Scottish Environment Protection Agency (124)
Mr Ian Cowe of Forestry Commission Scotland (126)
Mr Andrew Munnis of Montagu Evans LLP on behalf of M & G Real Estate (127)
Mr Simon Pallant of Scottish Government Planning and Architecture Division (164)
Mr Simon Pallant of Scottish Government Planning and Architecture Division on behalf of Forestry Commission Scotland (166)

Provision of the Development Plan to which the issue relates:	Provides protection for trees and woodland; avoid or reduce negative impacts on natural heritage

Summary of the representation(s):

Policy NE5: Trees and Woodland

Compensatory Planting

54: The Scottish Government's Control of Woodland Removal Policy sets out the role compensatory planting can make to mitigating woodland removal. Suggest that not explicitly mentioning the role of compensatory planting does not reflect national policy. Policy text at paragraph 3 should be amended.

Woodland

126, 166: Recommend more detail is drafted into policy and themes from National Planning Framework 3 and Scottish Planning Policy should be built in, specifically: 1) The principle of woodland expansion 2) General presumption in favour of protecting woodland resources 3) Protection and expansion of priority habitats.

66: A woodland strategy should be formalised and planting and felling policies established.

River Dee Crossing

127: M & G Retail are owners of land at Garthdee Retail Park and one of the options for an additional crossing to the River Dee would require land under owner's control.

Policy NE8: Natural Heritage

Support

124: Request additional wording and support the reference to Construction Environment Management Plans. Support the protection of peat and carbon rich soils protecting waterbodies and promoting their enhancement.

Geodiversity

54: Preamble in paragraph 3.119 should be amended. Geodiversity should be recognised in this Policy.

National Designations

54: The wording does not apply the level of protection required by Scottish Planning Policy. The third paragraph regarding national designations (including SSSIs) ends by stating that adverse effects would be acceptable if benefits are of city-wide importance. This is inconsistent with the policy for national designations set out in paragraph 212 of SPP, which states that benefits in such cases must be of national importance.

Non-Bird Species

54: The second paragraph refers to a survey being carried out but does not refer to a Protection Plan. The Policy should seek first to avoid the need for species licenses by requiring species Protection Plans to be submitted with planning applications. The Policy should comply with the Wildlife and Countryside Act 1981 by limiting derogation to non-bird species, hence the suggestion to include the words 'non-bird species'.

Peatland and Carbon Rich Soils

54: Scottish Planning Policy does not prohibit development affecting peatland or carbon rich soils.

Natura

164: The second paragraph should add that development that would have an adverse impact will only be permitted where compensatory measures are provided to ensure that the overall coherence of the Natura network is protected. The policy should be amended to ensure it is in accordance with Scottish Planning Policy.

Modifications sought by those submitting representations:

Policy NE5: Trees and Woodland

Compensatory Planting

54: Where trees may be impacted a Tree Protection and Mitigation Plan will need to be submitted and agreed before development activity begins. This should include details of compensatory planting, temporary earth works and site preparation.

River Dee Crossing

127: If this option is progressed Policy NE5 would need to be reviewed within the immediate location as the character would change with the construction of a new bridge.

Wording Amendments

166: Policy NE5 and the supporting text should be amended to cover the following: - The principle of woodland expansion - General presumption in favour of protecting woodland resources - Protection and expansion of priority habitats

Policy NE8: Natural Heritage

Text Amendments

54: Amend the text in paragraph 3.119, second sentence as follows: "All new development should seek to protect geodiversity and enhance biodiversity."

Amend the text in the third paragraph, final sentence to read: ". . .they must be clearly outweighed by social, environmental or economic benefits of national importance."

Amend the text in the second paragraph of the protected species section to read: "Development should seek to avoid any detrimental impact on protected species through the carrying out of surveys and submission of protection plans describing appropriate mitigation where necessary. Development likely to have a detrimental impact on protected species will not be approved unless; for European protected species, a thorough assessment of the site has demonstrated that the development is required for imperative reasons of overriding public interest and the population is maintained at a favourable conservation status in its natural range; or, for non-bird species protected under the Wildlife and Countryside Act 1981 (as amended) or the Protection of Badgers Act 1992, there will be significant social, economic or environmental benefits. In either case there must also be no other satisfactory solution. Please see relevant Supplementary Guidance for more information regarding Protected Species and licensing."

Replace "development which could involve draining or disturbing peatland or carbon-rich soil will be refused" with "there will be a presumption against development which would involve significant drainage or disturbance of peatland or carbon-rich soil." In addition reference should be made to mapping for carbon-rich soils, deep peat and priority peatland habitat as provided by the SNH Carbon and Peatland Map.

124: Request additional wording to Policy NE8 carbon-rich soils as follows: “New development should avoid areas of peatland or carbon-rich soil. Development which would involve draining or disturbing peatland or carbon-rich soil will be refused unless appropriate mitigation is agreed by the Planning Authority in consultation with SEPA”.

The following text should be incorporated into the Policy: "There is a presumption against development which would impact on groundwater dependent terrestrial ecosystems."

The following text should be added: “A Construction Environmental Management Plan may be required to address any ‘potential’ negative impacts on designated sites, protected species, ‘peatlands or carbon rich soils, waterbodies or local biodiversity’ during the construction phase of a development.”

164: The final sentence of the second paragraph of Policy NE8 should be amended as follows: "Development that would have an adverse effect will only be permitted where there are no alternative solutions and there are imperative reasons of overriding public interest, including those of a social or economic nature, and compensatory measures are provided to ensure that the overall coherence of the Natura network is protected."

Summary of response (including reasons) by planning authority:

Policy NE5: Trees and Woodland

Compensatory Planting

54: Scottish Planning Policy (SPP) (CD05 paragraph 218) states that "Where woodland is removed in association with development, developers will generally be expected to provide compensatory planting." In order to reflect SPP more comprehensively if the Reporter is so minded the text ‘compensatory planting’ could be added to the last sentence of the third paragraph of the Policy so it reads: "This includes **compensatory planting**, temporary earth works and any site preparation." This will ensure the Policy reflects national policy, and in particular the Scottish Government’s Control of Woodland Removal Policy.

River Dee Crossing

127: The Bridge of Dee Study – Scottish Transport Appraisal Guidance (STAG) Report (CD39) is currently underway which will develop options to address the long term need for additional transport capacity across the River Dee. We note that consideration will need to be given to reviewing the policy zoning once a potential conclusion has been made and the project comes forward.

Woodland

126, 166: The Council takes the view that Scottish Planning Policy will be considered alongside local policy and that Policy NE5 does broadly reflect the themes covered in SPP. Where paragraph 217 of SPP says that "planning authorities should seek opportunities to create new woodland", Policy NE5 reflects this approach through paragraph two by stating that "appropriate measures should be taken for the protection and long term management of existing trees and new planting." The Policy takes a general presumption in favour of protecting woodland through the first paragraph of the Policy which states: "There is a presumption against all activities and development that will result in the loss of, or damage to, trees and woodlands that contribute to nature conservation." In relation to the protection and expansion of priority habitats the Proposed Supplementary Guidance - Natural Heritage (CD25) covers the protection of habitats through paragraph 8.1.5, therefore it is deemed unnecessary to include these details within Policy NE5.

Woodland Strategy

66: Currently, there is the 'Forest and Woodland Strategy for Aberdeenshire and Aberdeen City' (RD30) and the intention is to review this Strategy in due course. This review could take the form of a stand-alone strategy or integration into a wider climate adaptation strategy. The work is on-going however it will undoubtedly include revised planting and re-stocking policies and be adopted as a Council strategy.

Policy NE8: Natural Heritage

In light of the comments made in relation to compliance with Scottish Planning Policy, if the Reporter is so minded the following amendments could be made to the Policy and accompanying text:

54: The term 'geodiversity' can be added to the last sentence in paragraph 3.119 to read: "All new development should seek to **protect geodiversity and** enhance biodiversity." This will align with the terminology used in the Natural Heritage Supplementary Guidance.

54: The term '**national importance'** can replace 'city-wide importance' in the last sentence of the third paragraph of Policy NE8 to apply the level of protection required by Scottish Planning Policy.

54: The Council considers that the second paragraph in the Protected Species section of Policy NE8 provides adequate requirements to avoid the need for species licenses. However, it is acknowledged that further details in relation to non-bird species could be of benefit as well as stronger emphasis on protection. It is felt that the level of detail expressed in the representation would be best addressed in the Supplementary Guidance on Natural Heritage.

54: It is considered that the suggested text on carbon rich soils is reasonable. Reporters may wish to consider replacing "development which could involve draining or disturbing peatland or carbon-rich soil will be refused" with "**there will be a presumption against** development which would involve significant drainage or disturbance of peatland or carbon-rich soil."

124: The reference to appropriate mitigation in relation to peatland or carbon-rich soil is already addressed through point 1 of the Policy. Therefore, the Council does not feel it necessary to add additional text. It is felt that the supporting text, in particular paragraph 3.120 "the need for healthy ecosystems", the Policy and Supplementary Guidance combined provide adequate protection for groundwater dependent terrestrial ecosystems.

124: The following text could be added: “A Construction Environmental Management Plan may be required to address any ‘potential’ negative impacts on designated sites, protected species, ‘peatlands or carbon rich soils, waterbodies or local biodiversity’ during the construction phase of development.”

164: The reference to compensatory measures in the second paragraph of Policy NE8 is already addressed through points 1, 4 and 5 of the Policy. It is felt that this reflects Scottish Planning Policy. Therefore, the Council does not feel it necessary to add additional text.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY NE6 & NE7: FLOODING, AND COAST PLANNING	33
Development plan reference:	Page 58-59	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Nina Turner of Scottish Natural Heritage (54)
Mr William Sell of Craigiebuckler and Seafield Community Council (66)
Ms Susanne Stevenson of Scottish Water (76)
Clare Pritchett of Scottish Environment Protection Agency (124)
Mr Simon Pallant of Scottish Government Planning and Architecture Division (164)

Provision of the Development Plan to which the issue relates:	Ensures no negative impact from flooding due to development; Assess development on coastal areas

Summary of the representation(s):

Policy NE6: Flooding, Drainage and Water Quality

Policy Approach

66: The Policy should be rigorously applied to developments. Support the presumption against excessive engineering and culverting of watercourses. Hazlewood development is an example of a failure to implement the Policy. Applications should include a Water Management Plan.

Sewers for Scotland

76: Preamble (page 57) - note that Sewers for Scotland 3rd Edition now released.

Wording of Policy and Text

124: Object and request several amendments as follows: The end of sentence at point 4 to be removed. If development requires new flood defences then there is a strong flooding risk; Paragraph 3.112 incorrectly implies that all flood risk can be managed through SUDS. Request text to clarify and reflect Supplementary Guidance; Recommend inserting text in relation to the functional floodplain; and insert waterbodies so it reads "...presumption against excessive engineering and culverting of waterbodies."

Support

66, 124, 76: Support the presumption against excessive engineering and culverting of watercourses. Support precautionary approach to flood risk, use of SUDS and protection and improvements to waterbodies.

Policy NE7: Coastal Planning

National Marine Plan

54, 164: Currently no reference to the National Marine Plan. The preamble to the Policy should reflect this.

Marine Noise Modelling

54: Marine noise modelling only required for certain developments and not all.

Modifications sought by those submitting representations:

Policy NE6: Flooding, Drainage and Water Quality

Sewers for Scotland

76: Update references to Sewers for Scotland 3rd Edition.

Wording of Policy and Text

124: Text changes: The following of the end of sentence, point 4 to be removed: "that would have a significantly damaging effect on the natural heritage interests within or adjacent to a watercourse."

Following text is added: Development on the functional floodplain will only be permitted where its location is essential for operational reasons "and it must be designed and constructed to remain operational during floods and not impede water flow."

Text amendment: There is a presumption against excessive engineering and culverting of "waterbodies."

Amendment to paragraph 3.112: Sustainable Drainage Systems (SuDS) provide multiple benefits including managing "surface water" flood risk. . .

Policy NE7: Coastal Planning

National Marine Plan

54: Amend text in paragraph 3.116, sentence 2 to read: "The National Marine Plan, published by the Scottish Government in March 2015, sets out strategic policies". The statement regarding the role of Supplementary Guidance should be revised in light of the publication of the National Marine Plan to avoid the suggestion that it has no current application. Amend text in paragraph 3.117 to clarify that the National Marine Plan applies from Mean High Water Springs to avoid implication that the principles of integrated zone management is the only management direction which

apply in the intertidal area.

Marine Noise Modelling

54: Amend text to read: "Development proposals may be required to demonstrate through appropriate marine noise modelling that the adverse impacts on bottlenose dolphins and Atlantic salmon are avoided."

Summary of response (including reasons) by planning authority:

Policy NE6: Flooding, Drainage and Water Quality

Support

66, 124, 76: The support for the Policy is welcomed.

Policy Approach

66: The Policy is clear about managing and reducing flood risk by ensuring that new development does not take place on areas susceptible to flooding without the need for the inclusion of Water Management Plans. This was dealt with during the planning application process for the Hazlewood site mentioned (130820).

Sewers for Scotland

76: While the policy makes reference to 'Sewers for Scotland 2 and its successors' in paragraph 3.114 we will amend this to read "Sewers for Scotland 3 and its successors". We will make this change as a Non-Notifiable Modification (CD26).

Wording of Policy and Text

124: Policy NE6 is in accordance with Scottish Planning Policy (CD05) and in particular paragraph 255 which states that "the planning system should promote flood reduction: assessing flood risk and, where appropriate, undertaking natural and structural flood management measures, including flood protection. .." The policy is clear about avoiding development in areas at risk from flooding and the Council is of the opinion there is not a requirement to remove the end of the sentence at point 4.

The Proposed Supplementary Guidance: Flooding, Drainage and Water Quality (CD25) includes more information to support Policy NE6. It stipulates that in relation to flood risk it is important to consider siting, design and in some cases the overall principle of development in a certain location. Further to that it also encourages pre-application advice from the local authority. Therefore the Council does not feel it is necessary to emphasise further detail in relation to the functional floodplain.

There is a request to alter "watercourses" to "waterbodies" in Policy NE6 so it reads: "There is a presumption against excessive engineering and culverting of

waterbodies". We will make this change as a Non-Notifiable Modification (CD26).

It is not considered that paragraph 3.112 implies that all flood risk can be managed through Sustainable urban Drainage Systems (SuDS) but rather it reflects Scottish Planning Policy paragraph 255, in promoting the avoidance of surface water flooding through the requirements of Sustainable urban Drainage Systems in all new development.

Policy NE7: Coastal Planning

National Marine Plan

54, 164: It is noted that the Proposed Plan was prepared before the adoption of the National Marine Plan 2015 (RD15). If the Reporter is so minded, the Council would accept the need to make two amendments to the text on page 56. The first is to update the relevant reference in paragraph 3.116, sentence two to read as follows: "The National Marine Plan, published by the Scottish Government in March 2015, sets out strategic policies. . ." The second is to amend the text in paragraph 3.117 to clarify that the National Marine Plan applies from Mean High Water Springs as set out in Circular 1/2015 (RD22). The sentence could read: "Terrestrial planning law extends to the mean low water mark of ordinary spring tides, whereas, marine spatial planning applies from Mean High Water Springs."

Marine Noise Modelling

54: If the Reporter is so minded, the council would accept the need to make a small amendment to point 4 in the policy text, replacing the word ‘will’ with ‘may’, to read as follows: "Development proposals **may** be required. . ."

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY R2, R3 & R4: CONTAMINATED LAND, AND WASTE	34
Development plan reference:	Page 63-66	

Body or person(s) submitting a representation raising the issue (reference no.):

Kris Furness of SITA UK (91)
Clare Pritchett of Scottish Environment Protection Agency (124)
Mr Fraser Littlejohn of Montagu Evans LLP on behalf of Buccmoor LP (160)

Provision of the Development Plan to which the issue relates:	Remediation of contaminated land; identifying and safeguarding sites for waste related uses and identifying criteria for waste facilities within different developments.

Summary of the representation(s):

Policy R2: Degraded and Contaminated Land

124: Request text is added into Policy to clarify the Scottish Environment Protection Agency's position.

Policy R3: New Waste Management Facilities

91: Endorse the general direction of the "Waste Management Facilities" section. Highlights that reference is made to minimising transport of waste from its source (paragraph 3.128 and Policy R3) but Scottish Planning Policy places an emphasis on need over proximity.

Policy R4: Sites for New Waste Management Facilities

91: Strongly support Policy R4 and the allocation of land at OP54 for a waste facility.

124: Support Policy R4 and the identification of waste management facilities to support the delivery of the Zero Waste Plan objectives including an energy from waste facility with potential links to users.

160: More explicit references should be made to qualify the nature and extent of use of the Household Waste Recycling Centre at OP13.

Modifications sought by those submitting representations:

Policy R2: Degraded and Contaminated Land

124: Request the following text (in capitals) is inserted into Policy R2 to clarify the Scottish Environment Protection Agency's position:

The City Council will require that all land that is degraded or contaminated, including visually, is either restored, reclaimed or remediated to a level suitable for its proposed use. This may involve undertaking site investigations and risk assessments to identify any actual or possible significant risk to public health or safety, or to the environment, including possible pollution of the water environment, that could arise from the proposals. THE CITY COUNCIL WILL LIASE WITH SEPA Where there is potential for pollution of the water environment AND/OR SEPA HAS A REGULATORY ROLE AT THE SITE OR WITH THE DEVELOPMENT PROPOSED.

Policy R4: Sites for New Waste Management Facilities

160: Make more explicit references to the nature and appropriateness of any such uses across the site being determined/guided by the Development Framework for OP13. The process may determine that other sites are more appropriate for any such development.

Summary of response (including reasons) by planning authority:

Policy R2: Degraded and Contaminated Land

124: Whilst the Scottish Environment Protection Agency's (SEPA's) suggested amendments do not constitute a change in policy direction, it is not considered necessary to expand the scope in which the Planning Authority will consult with SEPA. The circumstances in which SEPA must be consulted prior to determining an application is embodied in statute (including but not exclusively The Development Management Procedure (Scotland) Regulations 2013 (Schedule 5) (RD11). The current inclusion of text within the Policy relating to liaison with SEPA is not intended to be an exhaustive list.

Policy R3: New Waste Management Facilities

91: Endorsement is noted.

Whilst it is accepted that paragraph 3.128 and Policy R3 refer to minimising transport from its source this is not considered contrary to Scottish Planning Policy (CD05).

Policy R3 also specifies that proposals for waste management facilities must "meet a clear need for the development to serve local and/or regional requirements for the management of waste" (criterion 2). Scottish Planning Policy paragraph 182 (CD05) also states that the planning system should support the provision of a network of infrastructure and advises that as the network grows there will be scope for giving

greater weight to proximity in identifying suitable locations for new waste facilities.

Aberdeen City Council are expanding upon their existing network of infrastructure and whilst emphasis is placed on need, proximity to waste arisings is a legitimate consideration as per Policy R3.

Policy R4: Sites for New Waste Management Facilities

91, 124: Support is noted. Facilities at Proposed Plan Sites OP54 and OP107 are key priorities of the Aberdeen City Waste Strategy 2014 - 2025 (RD31) - Site specific comments are covered in Issue 13: Loirston and Cove.

160: A response to comments relating to the location of the recycling centre within Opportunity Site OP13 is dealt with in Issue 3: Allocated Sites in Bridge of Don/Grandhome.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY R7 & R8: EFFICIENT AND RENEWABLE DEVELOPMENTS	35
Development plan reference:	Page 66-69	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr John Handley of John Handley Associates Ltd on behalf of Shell UK Limited (38)
Ms Nina Turner of Scottish Natural Heritage (54)
Mr William Sell of Craigiebuckler and Seafield Community Council (66)
Ms Susanne Stevenson of Scottish Water (76)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr John Findlay of Ryden LLP on behalf of Dandara LLP (90)
Clare Pritchett of Scottish Environment Protection Agency (124)
Mr Blair Melville of Homes for Scotland (149)
Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Mr Simon Pallant of Scottish Government Planning and Architecture Division (164)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Requirements to reduce carbon emissions using low and zero carbon generating technology, and water efficiency, and assess applications for renewable and low carbon energy schemes.

Summary of the representation(s):

Policy R7: Low and Zero Carbon Buildings and Technology

General Comments

66, 76, 124: Support for the Policy.

66: Suggest that the Policy it is not being applied by developers.

Cost, Complexity and a Fabric First Approach

85, 90,149,152: Object to the Policy on the grounds of cost and complexity.

85,152,183: The issues should be addressed through a fabric first approach.

Building Standards

85, 90,152,183: This issue should be dealt with through Building Standards.

152,183: The fifth annual report on the operation of the Climate Change Act suggests that the planning system may not need the Low and Zero Carbon

Generating Technology requirement in the face of future Building Standards review which will potentially examine ‘net zero carbon standard’ and ‘nearly zero energy’.

Allowable Solutions

152: That Low and Zero Carbon Generating Technology is not sustainable and that the policy pre-empts research underway and proposals such as 'Allowable Solutions’.

Policy Wording Contradiction in Policy

183: The first sentence of the Policy is ambiguous, as it reads as requiring emissions reductions additional to targets specified by Building Standards. This is contrary to paragraph 3.139 of the supporting text.

149,183: The wording is contrary to the Climate Change Act. Compliance with the current Building Standards is sufficient to achieve a reduction.

Policy Should be Updated to Reflect Building Standards and Scottish Planning Policy

164: Suggestion that paragraph 3.137 of the Plan should be amended to reflect the introduction of the new Building Standards in October 2015 and paragraph 3.136 of the Plan should be amended to reflect a change in current Scottish Planning Policy in relation to energy efficiency. Policy should include future targets and more detail from the Supplementary Guidance should be in the Policy.

164: Suggestion that the Policy should include at least one increase in the proportion of emissions to be saved through the use of Low and Zero Carbon Generating Technology..

54: The requirements of the Policy should be written into the Policy not just the Supplementary Guidance and the requirements should match those of the Aberdeenshire Gold sustainability level for domestic buildings and Building Research Establishment Environmental Assessment Methodology level 5 standard for non-domestic buildings.

Terminology

54: It is noted that Scottish Environment Protection Agency issue ‘abstraction licences’ not ‘extraction licences’.

Water Abstraction from the River Dee SEA

54: Suggest that the Local Development Plan must ensure no increase in the level of water being abstracted from the River Dee (Submission also made to Issue 44: Habitats Regulation Appraisal).

Policy R8: Renewable and Low Carbon Energy Developments

Support

124: Support for the policy.

Safety Consultation Zones

38: Policy should be amended to make reference to the Pipeline Consultation Zones.

Wording

164: The term “negatively impact” should be altered in criteria 2 and 3 of the Policy as a development may have some negative impact but in the round be acceptable.

164: The term 'areas of search' in paragraph 3.142 of the Proposed Plan should be replaced with 'Group 3: Areas with potential for wind farm development' in line with Scottish Planning Policy.

Modifications sought by those submitting representations:

Policy R7: Low and Zero Carbon Buildings, and Water Efficiency

85, 90: Re-written to focus only on those matters which can be directly influenced or delivered by the planning system. Specifically, the targets set for C02 reduction, achieved by installing low and zero carbon generating technologies in new developments, should be removed.

152: Policy R7 should align with the building standards and should accord with current policy thinking, including that of the Scottish Government, on energy reduction targets. A flexible planning policy approach should be adopted in accordance with the principles of 'Fabric First + LZCT + Allowable Solutions' and not dictated by a single restrictive policy approach which may not be achievable and would be unlikely to provide for a solution that can be fulfilled on all sites.

149: First sentence: delete "must install Low and Zero-Carbon Generating Technology (LZCGT) to reduce the predicted carbon dioxide emissions by at least 20% below that." Replace with "must meet at least 20% of the carbon dioxide emissions reduction target by installing Low and Zero-Carbon Generating Technology (LZCGT)". Add additional sentence: "planning conditions may be used to deliver this policy while the detailed design and technical matters are being considered through the Building Standards process."

183: Policy R7 should be amended to read: “All new buildings must meet the Building Standards energy requirement. In complying with the Building Standards, they must meet a proportion of the carbon dioxide emissions Target by installing Low and Zero Carbon Generating Technologies. The proportion of the reduction which is met by Low and Zero Carbon Generating Technologies will be determined on a site

by site basis by the Building Standards and will change over time as the Building Standards are updated in 2015 and 2019. Planning conditions may be used to deliver this Policy while the detailed design and technical matters are being considered through the Building Standards process."

54: Add text to the Policy outlining the requirement for Gold sustainability level for domestic buildings and Building Research Establishment Environmental Assessment Methodology level 5 standard for non-domestic buildings from the date of the adoption of the Plan. Amend the text in paragraph 3.140 and in Policy R7 to remove the word 'extraction' and replace this with 'abstraction'.

164: The third sentence of paragraph 3.137 should be amended to read as follows: "While the 30% improvement applies from October 2010, in view of the economic downturn, Scottish Ministers requested that the Sullivan Panel reconvene to revisit some of their original recommendations. The output was the publication of a 2013 update to the Sullivan Report. In accordance with recommendations of the update, revised building standards will be introduced from October 2015." If the above amendment is inserted then the forth sentence of paragraph 3.137 is no longer necessary and should be deleted.

The final sentence of paragraph 3.136 should be removed and replaced with: "Scottish Planning Policy supports the planning system in reducing emissions and energy use in new buildings, promoting development that is resource efficient, and maximises the efficiency of the use of resources through natural or technological means."

The first sentence of Policy R7 should be amended to read as follows: "All new buildings, in meeting building regulations energy requirements, must install Low and Zero Carbon Generating Technology (LZCGT) to ensure they provide for at least 20% of the carbon dioxide savings required by the Scottish Building Regulations at the time of the application"

The final sentence of the first paragraph of Policy R7 should be amended to read as follows: "This percentage requirement will be increased as specified in the table below". Insert Table 1 from Aberdeen Local Development Plan draft Supplementary Guidance 'Topic Area 9 – Resources, Energy and Resources.'

54: "To avoid having to increase the amount of water Scottish Water are licensed to take from the River Dee, as a result of the new developments proposed in the Plan. For all new developments to use water-saving technology."

Policy R8: Renewable and Low Carbon Energy Developments

38: A new criteria should be inserted as point 5 within Policy R8 which states, "Any turbines proposed within Pipeline Consultation Zones must accord with the requirements of the Health and Safety Executive's PADHI Guidelines and the Guidance prepared by the United Kingdom Onshore Pipeline Operator's Association (UKOPA) regarding the siting of wind turbines close to high pressure pipelines. Further details are set out in the Supplementary Guidance on Wind Turbine

Development."

164: We recommend that the wording in Policy R8, parts 2 and 3 is changed from: Criteria 2 - "Do not negatively impact on air quality". Criteria 3 - "Do not negatively impact on tourism". to Criteria 2 - "Do not result in a significant adverse impact on air quality". Criteria 3 - "Do not result in a significant adverse impact on tourism".

In paragraph 3.142 the term "areas of search" should be replaced with: "Group 3: Areas with potential for wind farm development".

Summary of response (including reasons) by planning authority:

Policy R7: Low and Zero Carbon Buildings, and Water Efficiency

Section 72 of the Climate Change (Scotland) Act (RD07) is clear in relation to the requirement for Local Development Plans to incorporate Low and Zero Carbon Generating Technology (LZCGT) within developments. While Scottish Planning Policy 2010 (RD20) paragraph 44 directly supported this, the extant Scottish Planning Policy 2014 (CD05), paragraphs 152 to 168, do not directly reference LZCGT and put greater emphasis on reducing demand and on energy saving or "fabric first" approaches. This reflects recommendations from expert groups such as the Sullivan Panel (RD21) and many representations from the development industry.

As such the Proposed Plan and the supporting Proposed Supplementary Guidance 'Topic Area 9 – Resources for New Development' (CD25) must take a pragmatic approach. The Proposed Plan is clear in the requirement for LZCGT and this will also be referenced within the Supplementary Guidance with increasing LZCGT targets. However, the Supplementary Guidance also recognises that if better performance can be reached through a "fabric first" approach, this will be supported in line with Scottish Planning Policy (CD05) and the Sullivan Panel's recommendations (RD21). While the aim of the consultation on the Supplementary Guidance will be to strike a balance that will address these differing approaches, the Proposed Plan must include LZCGT requirements in line with the Climate Change (Scotland) Act (RD07).

<u>General Comments</u>

66, 76, 124: Support for the Policy is welcomed. Concern over the application of the Policy is noted. While the Policy has been implemented it is recognised that in its current format the policy is very complex, as are the calculations to show compliance with the Policy. The policy has been amended to help reduce this complexity while marrying a strong requirement to support a reduction in emissions. Supplementary Guidance will also be revised to reflect this including future targets for emissions reductions.

<u>Cost and Complexity</u>

85, 90, 149, 152, 183: Section 72 of the Climate Change (Scotland) Act 2009 (RD07)

is clear in requiring all developments identified in the Local Development Plan, to "avoid a specified and rising proportion of the projected greenhouse gas emissions from their use...through the installation and operation of Low and Zero-Carbon Generating Technologies". The complexity and associated cost of the technology is however recognised. The current Scottish Planning Policy (SPP) (CD05) places greater emphasis on energy efficiency over LZCGT and paragraph 154 of SPP notes the importance of energy efficiency, heat recovery, and efficient energy supply and storage. Proposed Supplementary Guidance Resources for New Development (CD25) in support of this Policy will include an option to satisfy Policy R7 by other means that achieve a CO2 saving greater than that required by the Policy. This is to be carried over from the current Supplementary Guidance which currently includes this option. In this way developments can satisfy the requirements of SPP though passive means, such as a fabric first approach, while still satisfying the requirements of the Climate Change (Scotland) Act 2009 by reducing greenhouse gas emissions.

Building Standards

85, 90, 152, 183: As noted above, the Climate Change (Scotland) Act 2009 (RD07) is clear on the requirements set for local authorities in relation to LZCGT. It is recognised that the current Policy R7: Low and Zero Carbon Buildings, in the extant Local Development Plan 2012 (CD42) is complex, as is the process to show compliance. The proposal in the Proposed Plan to make the policy requirement a percentage of the current Building Standard is hoped to simplify the process. Allowing for energy saving alternatives through Supplementary Guidance is also being considered, as this is identified in Scottish Planning Policy. The suggestion that the fifth annual report on the operation of the Climate Change (Scotland) Act 2009 questions the need for the LZCGT requirement with future improvements in Building Standards is noted. Until such time as the Climate Change (Scotland) Act 2009 is changed or other guidance is provided by Scottish Government, Local Authorities are required to comply with the Act. As noted earlier, it is however proposed that alternative means of satisfying the Policy such as fabric first will be considered as part of a Supplementary Guidance consultation.

Allowable Solutions

152: Allowable Solutions have been suggested by the Sullivan Panel (RD21) as a possible option to satisfy Section 72 of the Climate Change (Scotland) Act 2009. To date there is no policy on this issue and Scottish Planning Policy does not include this as an option. As such there is currently no option of using such solutions to satisfy the Policy. If this situation were to change these could be included within Supplementary Guidance and therefore could be addressed in the intervening period between Local Development Plans. This would however would only be possible where specific direction was given from the Scottish Government.

Wording

183: The Policy on LZCGT is a complex issue involving several different policy strands including the Climate Change (Scotland) Act 2009, Building Standards, and Scottish Planning Policy, as well as review groups such as the Sullivan Panel. Many of these have had a significant impact on the Proposed Plan in the intervening period

since the Main Issues Report consultation 2014. While the overarching aim of these national policies is the same, to reduce our impact on climate change, they operate to different time frames and have different primary objectives. An example of this can be seen in the difference between Section 72 of the Climate Change (Scotland) Act 2009 and Scottish Planning Policy. The Climate Change (Scotland) Act 2009 requires Local Development Plans to include polices requiring all developments identified in the Plan to "avoid a specified and rising proportion of the projected greenhouse gas emissions from their use...through the installation and operation of Low and Zero-Carbon Generating Technologies". While the previous Scottish Planning Policy from 2010(RD20) reflected this closely, the current SPP has changed the emphasis to reducing the need for energy through energy saving measures such as a fabric first approach.

Contradiction in Policy

149, 183: The concern over an impression of ambiguity between the first sentence of the Policy and paragraph 3.139 of the supporting text is noted. The extant Local Development Plan 2012 (CD42) set a target of achieving a 15% reduction in CO2 emissions over the 2007 Building Standards (RD12). To show compliance with this Policy a complex set of calculations involving the 2007 Building Standards, the building standards applicable at the time of the application (with and without LZCGT) and a percentage calculation between the results was required. The outcome of this was significant confusion from the development industry. To simplify this process, and in discussions with our Building Standards service, paragraph 3.139 was used to set out the Council's aim of making the CO2 reduction a percentage of the Building Standard applicable at the time of the application.

This approach also allows Building Standards to support the Council's Development Management Team in assessing submissions and engages Building Standards at an earlier stage. This also aligns with the approach of our neighbouring Local Authority, Aberdeenshire Council, and a simplified calculation process as well as future reduction targets will be included in a revised Supplementary Guidance.

The Respondent has noted that the first line of the Policy suggests the reduction is "additional to targets specified by Building Standards", this was not the aim of the Policy as clearly set out in paragraph 3.139. However it is recognised that the inclusion of the word "below", a carry-over from Policy R7: Low and Zero Carbon Buildings, of the extant Local Development Plan 2012, can be construed as an additional target. As noted earlier, any modification that can bring clarity to a complex issue is welcomed. The clarity sought by the Respondent is reasonable. If the Reporter is so minded the sentence could be amended to substitute "below" for "of" thereby reflecting the supporting text of the policy.

Changes in Relation to Scottish Planning Policy

183: The suggestion that paragraph 3.137 of the Proposed Plan should be amended is noted. The proposed change does not appear to correct any inaccuracy in the Proposed Plan and would remove reference to the Strategic Development Plan in the final sentence. As such this is seen as retrograde step in terms of setting the

document in context. The proposed change is therefore not supported.

The suggestion that paragraph 3.136 of the Plan should be amended to reflect a change in the current Scottish Planning Policy (CD05) in relation to energy efficiency is noted. The modification seeks to replace the final sentence of the paragraph. This sentence references the active support shown for Low and Zero Carbon Generating Technology in the previous Scottish Planning Policy 2010 (RD20) paragraph 44, which in turn supported Section 72 of the Climate Change (Scotland) Act (RD07). As the explicit support for LZCGT has been removed from the current Scottish Planning Policy (CD05) paragraph 152 to168, the modification sought by the respondent in relation to paragraph 3.136 is reasonable. If the Reporter is so minded the sentence could be amended as indicated above.

Policy should Include Future Targets and More Detail from the Supplementary Guidance should be in the Policy

54, 164: The suggestion that the Policy should include future increases in the emissions savings and more detail of the Policy is not supported. As noted earlier, and in a number of submissions, there have been changes in both Policy and recommendations from expert groups such as the Sullivan Panel since the adoption of the extant Local Development Plan 2012. These include a change in Scottish Planning Policy from directly referencing LZCGT to an emphasis on energy efficiency and heat recovery, and greater emphasis in the Sullivan Report on a fabric first approach. By including future increases in supporting Supplementary Guidance it allows the flexibility to react to any future changes identified by Scottish Government. The issue of suggested changes to the target requirements of the Policy will be considered within the review of the Supplementary Guidance but it is the view of the Council that this should align with Aberdeenshire Council's Policy where possible.

54: The suggestion that more detail from the Supplementary Guidance should be included in the Policy would run contrary to Planning Circular 6/2013: Development Planning (CD10). The Circular is clear that the purpose of Supplementary Guidance is to allow Plans to focus on Vision, the Spatial Strategy, overarching and other key policies and proposals, and allow supporting detail to be provided within Supplementary Guidance. The Policy in this case set outs the requirements and the Supplementary Guidance will detail the options available for satisfying the Policy.

Incorrect Terminology

54: The incorrect use of the term 'extraction' in place of 'abstraction' is noted. This change has been made as a Non-Notifiable Modification by the Planning Authority, as is highlighted in CD26.

Water Abstraction from the River Dee SEA

54: This issue has been dealt with under Issue 44: Habitats Regulation Appraisal.

Policy R8: Renewable and Low Carbon Energy Developments

Support for the Policy

124: Support for the Policy is welcomed.

Safety Consultation Zones

38: Concern over the Pipeline Consultation Zones is noted. These Zones are shown on the Proposed Plan's Additional City Wide Proposals Map (CD24) and are considered through the planning application process as set out in Proposed Plan Policy B6 – Pipelines, Major Hazards and Explosives Storage Sites. There is therefore no need for each individual Policy to highlight the Consultation Zones as under Policy B6 all development which is subject to the planning process, and that is notifiable to the Health and Safety Executives, is screened against any impact on these Zones during the planning process.

Wording of the Policy

164: The recommendation that the term 'areas of search' in paragraph 3.142 of the Proposed Plan is replaced with 'Group 3: Areas with potential for wind farm development' is noted. This change has been made as a Non-Notifiable Modification by the Planning Authority, as is highlighted in (CD26).

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	POLICY CI1: DIGITAL INFRASTRUCTURE	36
Development plan reference:	Page 69	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152)
Mr Simon Pallant of Scottish Government Planning and Architecture Division (164)

Provision of the Development Plan to which the issue relates:	Promote digital infrastructure in new residential and commercial developments

Summary of the representation(s):

152: It is unreasonable for the planning system to expect that all new residential and commercial development have high speed communication infrastructure. This does not satisfy Circular 3/2012: Planning Obligations and Good Neighbour Agreements. Funding and mechanism's are already in place for this infrastructure at a national level with Fibre To The Cabinet.

164: The Plan does not encourage opportunities for home-working, live-work units, micro-businesses and community hubs.

Modifications sought by those submitting representations:

152: Delete the Policy

164: Amend the Plan to include supportive text to encourage opportunities for home-working, and live-work units, micro-businesses and community hubs in order to reflect paragraph 95 of Scottish Planning Policy.

Summary of response (including reasons) by planning authority:

152: The Vision and Objectives for the Proposed Plan are the same as in the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12). The role of the Strategic Development Plan is to "set clear parameters for subsequent Local Development Plans and inform decisions about strategic infrastructure investment." (Circular 06/2013 (CD10) Paragraph 41). It sets a clear strategy for development in Aberdeen. An objective of the Strategic Development Plan is to promote economic growth with one of the targets being, “For all new development to have the use of

modern, up-to-date high-speed telecommunications networks, such as fibre optics." (page 25).The Proposed Plan reflects this requirement through Proposed Policy CI1. It also reflects the policy principles supporting digital connectivity in paragraph 293 of Scottish Planning Policy (CD05) and the development planning requirements set out in paragraph 297.

164: The Plan does not preclude/prejudice/prevent the development of home-working, and live-work units, micro-businesses and community hubs. Proposed Policy CI1 indirectly supports this by providing opportunities for flexible working arrangements as is outlined in the Policy preamble in paragraph 3.143.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	PROPOSALS MAPS	37
Development plan reference:	City Wide Proposals Map, Additional City Wide Proposals Map and City Centre Proposals Map	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr Ken Hutcheson (9)
Mr Mike Williams of Scott Hobbs Planning on behalf of Scottish Enterprise (120) Mr Christopher Ross of Barratt North Scotland (125)
Mr Colin Lavety of Barton Willmore on behalf of Aberdeen Harbour Board (137)
Mr Kenneth Hutcheon (182)

Provision of the Development Plan to which the issue relates:	City Wide Proposals Map, Additional City Wide Proposals Map and City Centre Proposals Map

Summary of the representation(s):

Aberdeen Western Peripheral Route

9: Maps 1-5 give an unrealistic and false impression of the roads transport infrastructure due to the omission of the Aberdeen Western Peripheral Route.

Cross Boundary Issues

120: To provide a clear context consideration needs to be given to expressing the interdependency with the Aberdeenshire area, by indicating the locations of the important Strategic Growth Zones, policy zones and employment areas. Areas where there are cross overs should be shown on the Proposals Maps.

As Energetica extends in to the City and Shire all plans showing Energetica should show that part within the neighbouring authority.

Sites

120: Remove zoning B2 from the Aberdeen Energy Park and reallocated as B1. Planning Permission in Principle (131483) was approved for the extension to the Aberdeen Energy Park to allow for development of Class 4, 5 and 6 uses.

125: Object to Non-Allocation of B0924, Thornhill and non-allocation of B0306 Newton East.

Coastal Management Areas

137: The 'Developed Coastal Management Areas' and the 'Undeveloped Coastal Management Area' appear to be drafted the wrong way round.

Core Paths

137: The Core Path will be need to be diverted around the new harbour.

182: Query the Core Paths strategy in the Proposed Plan Map and the Supplementary Guidance. There appears to be a Core Path through Queens Cross/Harlaw Community Council; it turns right at Anderson Drive and down to Queens Road then straight onto Union Street. However, having walked the route there is little that can be described as a Core Path, especially when compared to the description by Scottish Government in 'Core Paths Plans - A Guide to Good Practice'.

Modifications sought by those submitting representations:

Cross Boundary Issues

120: Wider context to the City Wide Proposals Map including identification of Energeica and other growth areas, and the entirety of allocations, where sites are bisected by the Councils' boundary lines.

Sites

120: Rezone the Energy Park as B1.

125: Remove Newton East and Thornhill from Green Belt and rezone as LR1.

Coastal Management Area

137: The Legend on the Additional City Wide Proposals Map should be amended to reverse the colours used to indicate areas of 'Developed Coastal Management Area' and 'Undeveloped Coastal Management Areas'. These should be denoted in the Legend as dark green and light green respectively.

Core Paths

137: Amend the maps to show the Core Path network being outwith the area proposed as operational Harbour.

182: Clarification and correction to Core Paths information.

Summary of response (including reasons) by planning authority:

Aberdeen Western Peripheral Route

9: It may be that the Respondent is referring to the maps in the Main Issues Report as they do not show the line of the Aberdeen Western Peripheral Route (AWPR). However the line is shown on the Proposed Plan Proposals Map and the Compulsory Purchase Areas are shown on the reverse Additional City Wide

Proposals Map (CD23 and CD24).

Cross Boundary Issues

120: It is considered that the City Wide Proposals Map provides an adequate representation of the Spatial Strategy in that it shows the allocations, Opportunity Sites and zonings for the whole city area. There are no settlements bisected by the city boundary, although two Opportunity Sites at OP53 Aberdeen Gateway and OP34 East Arnhall comprise developments that extend into Aberdeenshire. The boundary and extent of Energetica is shown in the Proposed Supplementary Guidance on Energetica (CD25). It is considered that the Aberdeen City and Shire Strategic Development Plan 2014 (CD12) is the appropriate vehicle for showing cross boundary issues.

Sites

120: The policy zoning of Aberdeen Energy Park in Bridge of Don is dealt with in Issue 3 Allocated Sites in Bridge of Don/Grandhome.

125: The site at Newton East is dealt with under Issue 8 Alternative Sites Kingswells and Greenferns. The site at Thornhill is dealt with under Issue 12 Alternative Sites Deeside.

Coastal Management Areas

137: This is a drafting error on the key of the Additional City Wide Proposals Map. The Council will correct this error as a Non-Notifiable Modification (CD26).

Core Paths

137: The Proposed Plan shows the current Core Path network as outlined in the Core Path Plan 2009 (RD35). The diversion of Core Paths is not dealt with through the Proposed Plan but through a separate statutory process – specifically the Land Reform Act 2003.

182: The urban routes included in the Core Path Plan are mainly concentrated on existing streets that pass by or link visitor attractions such as those promoted through the City Trails leaflets. The route described is Core Path 96 Castlegate to Anderson Drive. This passes through many City Centre and West End neighbourhoods and is a key strategic link from the City Centre towards the paths network on the west of the City. Various schools and other facilities and services are located along the way. The route provides access to various sites of historical and cultural importance, including destinations on Aberdeen's Granite and Sculpture Trails.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	APPENDIX 1 - BROWNFIELD SITES	38
Development plan reference:	Pages 77-78	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr George Wood of Old Aberdeen Community Council (100)

Provision of the Development Plan to which the issue relates:	Lists Brownfield sites

Summary of the representation(s):

Appendix 1 – Brownfield

85, 100: Table 1 and 2 in Appendix 1 dealing with brownfield sites require to be up-dated. Table 2 is based on the 2011 Housing Land Audit when the more recent 2014 Audit is available. Many of the sites listed already have approved planning consent and are being developed. These should not be counted as available sites and the table should be updated to reflect the current status.

Modifications sought by those submitting representations:

85: The following sites should be removed for the reasons stated:

- Bankhead Academy- to be redeveloped for a new primary school;
- Bankhead Infant School- to be retained for education;
- Causewayend Primary School- to be redeveloped for student accommodation;
- Dunbar Halls- to be retained by the University of Aberdeen for its own use;
- John Street- to be redeveloped to provide student accommodation; and,
- Craigieburn House- restricted to over 55's.

Summary of response (including reasons) by planning authority:

Appendix 1 – Brownfield

85, 100: The Tables presented in this Appendix will always show a snapshot in time as new applications and new proposals for these sites come forward. It is inevitable that more, as yet unidentified, brownfield sites will continue to emerge over the

lifetime of the Local Development Plan, and that some of the sites identified will be developed out. We will continue to monitor ongoing consents and brownfield potential through regular updates of the Brownfield Potential Study.

Table 1 is taken from the Brownfield Potential Study 2014 (CD36) and Table 2 is based on the Housing Land Audit from 2011 (RD37) as that is the baseline information that is used by the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) in setting out the housing allowances in Schedule 1 (page 42).

Our response to Issue 2 - Housing Land Supply discusses our approach to meeting the targets for brownfield land set by the SDP. The SDP identifies the number of brownfield units required for Aberdeen City in its Schedule 1. These are over and above those units identified as being part of the effective supply of 2011. The list of sites and numbers identified in Appendix 1 Table 2 of the Proposed Plan are those which have been given planning consent since 2011 but do not include any of the 1188 units considered effective by the 2011 Housing Land Audit. They are therefore eligible to be counted towards meeting the targets set by the SDP.

Section 2.2 of the Brownfield Potential Study shows that brownfield housing completions have averaged 688 a year for the period 1993 to 2013. Only for the three years following the financial crash (2008-10) have there been fewer than 500 brownfield units completed (which is what the SDP requires).

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	APPENDIX 2 - OPPORTUNITY SITES	39
Development plan reference:	Pages 79-90	

Body or person(s) submitting a representation raising the issue (reference no.):

Mr John Handley of John Handley Associates Ltd on behalf of Shell UK Limited (38)
Ms Nina Turner of Scottish Natural Heritage (54)
Mrs Caroline Nutsford of GVA Grimley Ltd on behalf of Telereal Trillium (78)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr Alasdair Morrison of GVA James Barr on behalf of Leto Limited (89)
Mr Malcolm Campbell of Knight Frank LLP on behalf of Moorfield Group Limited (94)
Mr Chris Pattison of Turnberry Planning Ltd on behalf of The Grandhome Trust (101)
Mr Roger Laird of Archial Norr on behalf of BP Midstreams Pipelines (108)
Mrs Elaine Farquharson-Black of Burness Paull LLP on behalf of North East Scotland College (109)
Clare Pritchett of Scottish Environment Protection Agency (124)
Mrs Theresa Hunt of Burness Paull LLP on behalf of Aberdeen Football Club (146)

Provision of the Development Plan to which the issue relates:	List the Opportunity Sites

Summary of the representation(s):

Pipeline Consultation Zones

38: Specific reference to, and standardized wording used, to draw attention to Policy B6 and the Pipeline Consultation Zone and PADHI Guidelines should be made in Appendix 2 to sites OP23: Dyce Drive, OP24: A96 Park & Ride, OP34: East Arnhall, OP44: North Last Quarry, and OP63: Prime 4 Business Park Phase 5 Extension. If any site boundaries are reviewed or any new or expanded development allocations made following Examination then full recognition must be given to the existence of any Pipeline Consultation Zones and development allocations, and new development must be undertaken in accordance with PADHI Guidelines.

Strategic Environmental Assessment Mitigation

54: The Respondent considers that a link should be provided between this part of the Local Development Plan and the Strategic Environmental Assessment. Appendix 2 includes some mitigation measures for allocated sites under 'Other factors'. However there is a danger that the further mitigation measures set out in the SEA (especially within Appendix 4b Greenfield Preferred Options) and Appendix 5b Brownfield Preferred Options) will get overlooked, if not listed here.

Flooding

85: The "Other Factors" relative to sites OP30, Kingswells D and West Huxterstone

and OP38, Countesswells should be up-dated to reflect that permissions are in place and flood risk issues have been satisfactorily addressed.

128: Object to the following Opportunity Site allocations unless the following text is added to OP1, OP24, OP31 and OP80: "Flood Risk Assessment required to accompany development proposals".

128: Recommend that text to identify that surface water flooding may be an issue at the following sites (OP75, OP86, OP32, OP108, OP107, OP110 and OP35) and that any Drainage Impact Assessment should address this issue is incorporated into the Proposed Plan.

128: Support the identification of potential flood risk and the requirement for flood risk assessments.

Retail

89: The Plan does not offer a list of proposed retail allocations.

OP52 Malcolm Road, Peterculter

54: This site is included in the Ancient Woodland Inventory (Long established of plantation origin) and the Scottish Semi-Natural Woodland Inventory. Although part of it appears to have been cleared in the recent past, approximately 80% of the woodland remains intact. The cleared area would be unlikely to be able to accommodate the number of houses currently proposed.

The Scottish Government's Control of Woodland Removal Policy includes strong presumptions in favour of protecting Scotland's woodland resources and against removing ancient semi-natural woodland. The policy also states that woodland removal should be allowed only where it would 'achieve significant and clearly defined additional public benefits'. It is not clear how the proposal meets that test or any of the other 'acceptability criteria for woodland removal' in Annex C of the policy. Even if it did, the policy still requires appropriate compensatory planting is carried out, which is not an explicit requirement for this site.

OP52 Woodend, Peterculter

54: The woodland within this site is included in the Ancient Woodland Inventory and the Scottish Semi-Natural Woodland Inventory. It is also part of Aberdeen City Green Network. The Scottish Government's Control of Woodland Removal Policy includes strong presumptions in favour of protecting Scotland's woodland resources and against removing ancient semi-natural woodland.

Although the allocation does not necessarily imply woodland will need to be removed, it is difficult to see how 19 houses could be accommodated without some level of impact on the woodland. In addition, the woodland is also part of Aberdeen's Green Space Network. As such (in line with Policy NE1) this development is required to "maintain and enhance the coherence of the network. In doing so, provision

should be made for access across roads for wildlife and outdoor recreation".

OP62: Nigg Bay Harbour Expansion

54: Text should be added to allow for the Habitats Regulations Appraisal (HRA) conclude there will be no adverse effects on the integrity of Natura sites.

Land at Froghall Terrace

78: Land at Froghall Terrace should be retained as an Opportunity Site. The site is existing OP104 in the current Local Development Plan. The western part has been built out as a residential development by Barratt Homes. The site is identified as mixed use; the Main Issues Report Schedule 4 stated site OP104 will be retained as a brownfield opportunity site. The site is in a highly sustainable location, and is capable of being redeveloped and delivered in the Plan period. There is potential for student accommodation or residential development.

OP9 Grandhome

101: Grandhome Trust objects to the description of OP9 in terms of the level of retail floor space which identifies that Grandhome Town Centre will comprise approximately 7,500 square metres in retail floor space. The wording is contradictory to the intention of Proposed Policy NC8.

The figure in Appendix 2 is significantly below that which has been approved in the Planning Permission in Principle and does not align with the details in the Grandhome Development Framework.

OP87 Pittodrie Park

146: Aberdeen Football Club welcomes the allocation of OP87 for a proposed residential development. Planning Permission in Principle has been granted and the redevelopment of Pittrodie stadium is linked to the construction of a new stadium on site OP59.

OP3 Findlay Farm, Murcar

94: Reference relating to Scottish Enterprise's involvement should be deleted and all remaining references in the plan correctly refer to the site being the Aberdeen Energy Park. Scottish Enterprise no longer have involvement at the Energy Park.

OP62: Nigg Bay Harbour Expansion

54: The recommended text should be added to allow for the Habitats Regulations Appraisal (HRA) to conclude there will be no adverse effects on the integrity of Natura sites.

Modifications sought by those submitting representations:

Pipeline Consultation Zones

38: Wording modified in Appendix 2 for OP23: Dyce Drive, OP34: East Arnhall and OP44: North Last Quarry and wording added to Appendix 2 for OP24: A96 Park and Ride and OP63: Prime 4 Business Park Phase 5 Extension. The text should read: ”The site lies within a pipeline consultation zone and all development should conform to the terms of Policy B6: Pipelines, Major Hazards and Explosive Storage Sites”.

Strategic Environmental Assessment Mitigation

54: Under 'Other Factors ’add the text: “(see also mitigation requirements in SEA Environmental Report)”

Flooding

128: Object to the following Opportunity Site allocations unless the following text is added to OP1, OP24, OP31 and OP80: "Flood Risk Assessment required to accompany development proposals".

128: Recommend that text to identify that surface water flooding may be an issue at the following sites (OP75, OP86, OP32, OP108, OP107, OP110 and OP35) and that any Drainage Impact Assessment should address this issue is incorporated into the Proposed Plan.

OP52: Malcolm Road, Peterculter

54: We advise that: The number of houses proposed for this site be reduced to a number that could be accommodated in the area currently cleared of trees. If housing is allocated for the area that has been cleared, a Site Brief and a Woodland Management Plan should be required to secure the protection and management of the remaining woodland in the longer term.

OP109: Woodend, Peterculter

54: We advise that the boundary of this site allocation is redrawn to exclude remaining areas of woodland. An alternative approach to securing the woodland would be for the Plan to require a Development Brief to be provided that would set out how the existing woodland within the site would be protected and managed in the long term for the benefit of the residents and the wider public.

Land at Froghall Terrace, Aberdeen

78: Identify the site as a brownfield Opportunity Site. The delineation of the site from the extant Local Development Plan could be amended to remove the western part which has now come forward as residential development.

OP9 Grandhome

101: Request that the details in Appendix 2 are amended to reflect the Development Schedule submitted as part of the Planning Permission in Principle which indicates approximately 20,000 square metres of retail floor space, and in turn warrants the Tier 2 Town Centre status sought.

OP5 Balgownie Centre, Bridge of Don

109: Appendix 2, page 79, should refer to the planning permission for the demolition of the existing college buildings and the erection of 30 dwelling houses, 42 townhouses and 99 flats, together with car parking and public open space which was issued on 11 June 2013.

OP87 Pittodrie Park

146: The extant planning permission should be noted in the description of OP87 on page 89.

OP3 Findlay Farm, Murcar

94: The reference to "Aberdeen Science and Energy Park" under OP3 Findlay Farm in Appendix 2 - Opportunity Sites should be deleted and replaced with "Aberdeen Energy Park".

OP62: Nigg Bay Harbour Expansion

54: The following text should be added: “No adverse effect on the integrity of Moray Firth SAC through construction or operational activities causing non-physical disturbance to bottlenose dolphin due to elevated underwater noise and vibration levels, and also the displacement of prey species. No adverse effect on the integrity of the River Dee SAC through construction or operational activities affecting the qualifying interests or the habitats supporting them (including water quality).”

Summary of response (including reasons) by planning authority:

Pipeline Consultation Zones

38: Pipelines will continue to be protected through Proposed Plan Policy B6 and it is not considered necessary to add a specific reference to this Policy within the ‘Other Factors’ column in relation to the sites mentioned. Pipelines are already clearly marked on the Proposed Plan Additional City Wide Proposals Map for consideration by Planning Officers, and therefore the need to consider Policy B6 is highlighted.

Strategic Environmental Assessment Mitigation

54: A decision has been taken by the Council to include the Strategic Environmental Assessment (SEA) Mitigation measures within the Proposed Action Programme (CD21) in order to afford greater flexibility. We also consider that it would have been premature to state the mitigation measures through the Proposed Plan given as the SEA Environmental Report is technically not finalised and hasn't been approved.

Flooding

85: With reference to OP30: Kingswells D and West Huxterstone and OP38: Countesswells, it is not considered appropriate to document that planning permission has been achieved and flood risk issues have been addressed on these sites as development on these sites has not been completed.

128: With regards the suggestion from the Respondent that additional text regarding Flood Risk Assessments is added to sites OP1, OP24, OP31 and OP80, the suggested wording seems reasonable if the Reporter is so minded to include the text into the 'Other Factors' column.

The Council also considers the suggestion to highlight that surface water flooding may be an issue at Sites OP75, OP86, OP32, OP108, OP107, OP110 and OP35 to be reasonable and, if the Reporter is so minded, would be content for additional wording referring to the need for this matter to be addressed via a Drainage Impact Assessment to be included in the 'Other Factors' column.

Retail

89: The Schedule makes it clear which sites are allocated for retail and it is considered that, although a separate list may be helpful, it is unnecessary. There is no reason for the Council to do this for retail, and not for other uses.

OP52: Malcolm Road, Peterculter

54: A detailed response to matters raised in relation to this site is provided in Issue 11. Any development would be required to mitigate for loss to established Woodland and comply with Policy NE5 of the Proposed Plan. These issues do not preclude development and can be dealt with at the planning application stage. The site's capacity in terms of the number of houses to be developed is indicative and will only be finalised after any Masterplan / planning application is approved. There is no over-riding justification for altering what is stated or shown in the Proposed Plan. The issues raised in regard to compensatory planting have been dealt with under Issue 33.

The Council takes the view that Scottish Government Policy will be considered alongside local policy and that Policy NE5 does broadly reflect this. The Policy takes a general presumption in favour of protecting woodland through the first paragraph of the Policy which states: "There is a presumption against all activities and development that will result in the loss of, or damage to, trees and woodlands that contribute to nature conservation." Policy NE5 then goes on to state that "appropriate

measures should be taken for the protection and long term management of existing trees and new planting."

As this site is to be developed for more than 50 homes, the developer will be required to prepare a Masterplan prior to applying for planning permission. At the start of the Masterplanning process, consideration has to be given to retention of existing trees and the planting of new trees. Initial surveys should examine the existing tree cover and how this relates to existing trees on adjacent sites. The issues raised in regard to compensatory planting have been dealt with under Issue 33.

Regarding the Green Space Network, the terms of Policy NE1 make it clear that it is for the Masterplanning process to determine this in detail. In doing so, it should reflect the particular purpose and function of the green space designation and the circumstances of each site.

OP109: Woodend, Peterculter

54: A detailed response to matters raised in relation to this site is provided in Issue 11.

Land at Froghall Terrace

78: The Opportunity Site designation has been removed from this site as a reasonable proportion of the site benefits from planning permission, with construction underway. It is noted that the Respondent has suggested that the site is capable of being redeveloped and the Council agrees with this statement. The Respondent suggests that the site may be suitable for student accommodation or residential development, both of which could be considered as an appropriate use in the context of the existing Mixed Use Allocation. Although Officers may have considered carrying forward the OP Site during its consideration of the responses received at Main Issues Report stage (CD29), it now no longer considered that the remaining part of the site (i.e. that area not subject to planning permission) in itself warrants designation as an individual Opportunity Site.

OP9 Grandhome

101: It is not considered that there is a need to include details of individual Development Frameworks or planning permissions within this Appendix. The Development Framework referred to is currently Supplementary Guidance to the extant Aberdeen Local Development Plan 2012 and the Council would intend to readopt this document as Supplementary Guidance to the next Local Development Plan, as outlined in Appendix 4 of the Proposed Plan. Specific details regarding retail provision are present, and therefore approved, within this document. With regards the Respondent's comment that the detail in this Appendix is contrary to Policy NC8, we would disagree as the intention of this Policy is to allow the provision of new retail development to serve the larger Masterplan Zones, such as Grandhome.

OP5 Balgownie Centre, Bridge of Don

109: It is not considered that there is a need to include details of individual planning permissions within this Appendix.

OP87 Pittodrie Park

146: It is not considered that there is a need to include details of individual planning permissions within this Appendix.

OP3 Findlay Farm, Murcar

94: This change has been made as a Non-Notifiable Modification by the Planning Authority, as is highlighted in CD26.

OP62: Nigg Bay Harbour Expansion

54: Nigg Bay Harbour Expansion is identified in National Planning Framework 3 (CD04) as a project of national importance. The Proposed Plan has therefore supported the delivery of the project through its identification within the Plan as an Opportunity Site, OP62, and supporting Policy B5 Aberdeen Harbour. The project is also being supported by the creation of a Development Framework and subsequent Masterplans which we would intent to adopt as Supplementary Guidance to the Proposed Plan further to its adoption. These processes allow for detailed scrutiny of the project by the public, prescribed bodies and the Planning Authority.

It would be impractical to insert the suggested paragraph into Appendix 2. It is likely that a development of this scale will have some impact on the Moray Firth Special Area of Conservation and the River Dee Special Area of Conservation. Table 4.3 of the attached Habitats Regulations Assessment (CD27) to the Proposed Plan identifies the risks and notes the mitigation measures required, including: “Phasing to allow impacts to be adequately managed, insuring adequate infrastructure is in place for each phase of development and that the relevant HRA and EIA for individual developments address there likely impacts.”

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	APPENDIX 3 - INFRASTRUCTURE REQUIREMENTS FOR MASTERPLAN ZONES	40
Development plan reference:	Pages 91-93	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Susanne Stevenson of Scottish Water (76)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr Chris Pattison of Turnberry Planning Ltd on behalf of The Grandhome Trust (101)
Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148)
Mr Blair Melville of Homes for Scotland (149)
Mr Ben Freeman of Bancon Developments (183)

Provision of the Development Plan to which the issue relates:	Lists Infrastructure Requirements for the Masterplan Zones

Summary of the representation(s):

General

148: Action Programme and Local Development Plan need to be consistent. Stoneywood has been removed from the Action Programme as a Masterplan Zone but it is still identified in Appendix 3.

Cumulative Transport Infrastructure

183: It is not clear from the text what this is. On the basis that it is a reference to the Supplementary Guidance on Strategic Transport Fund (STF), it should be noted that the 'schemes' which STF fund are not listed in the Supplementary Guidance. This requires to be clarified so that there is clearly no overlap with the requirements listed under 'Roads' or 'Public Transport' and accordingly no 'double counting' of contributions.

Update to Reflect Masterplans/Planning Permissions/Legal Agreements

<u>General</u>

149: Appendix 3 sets out obligations for Masterplan areas. These are all sites allocated in the extant Local Development Plan 2012. However, the developer requirements have changed and increased since 2012 which is unacceptable in a context where landowners and developers are well-advanced with Masterplans and Section 75 negotiations.

<u>Roads</u>

101: The Grandhome Trust has undertaken extensive assessment and negotiation and propose revised wording for Grandhome Masterplan Zone in line with the

Planning Permission in Principle.

Education

183: Various educational requirements are highlighted for the Maidencraig Masterplan Zone. However this has been overtaken by events and the Section 75 associated with the planning application for the site sets out the final requirements.

Health

85: The infrastructure requirements for Masterplan Zones need to be up-dated in respect of health.

85: Countesswells should be amended to reflect the scale of provision agreed through the Section 75 agreement which significantly exceeded the initial anticipated requirements.

85: Friarsfield should be deleted as the medical centre at Cults is privately owned and developers should not be expected to fund such businesses.

148: Amendments to reflect changes in NHS Grampian's requirements since the extant Local Development Plan was prepared and followed through to Action Programme.

Strategic Wastewater Infrastructure

76: Scottish Water is exploring opportunities to deliver a more holistic approach to providing strategic wastewater infrastructure as well as water infrastructure to meet the cumulative demands of developments.

Modifications sought by those submitting representations:

Update to Reflect Masterplans/Planning Permissions/Legal Agreements

General

149: Revert to the requirements for Masterplan areas set out in the current adopted Plan.

Roads

101: Modify Appendix 3 in respect of Masterplan Zone:

"Localised road upgrades as set out in Planning Permission in Principle Ref 131535 with regards to site OP9 in addition to any supplementary requirement as identified for site OP8 - East Woodcroft North."

Health

85: Reflect scale of provision of provision agreed through the Section 75.

148: Amendments to "Health" section of Appendix 3. The respondent has highlighted amendments from Proposed Plan in bold:

Extension (s) **to Primary Care facilities such as Bridge of Don Clinic, Scotstown Medical Practice and Oldmachar Medical Practice within the development catchment area to accommodate additional GP's, support Staff and other primary care support services.** One new Community Pharmacy.	**Zone 1 – Dubford OP10 (and contribution from other residential site at East Woodcroft North OP8, Dubford Community Facilities OP4, Balgownie Centre OP5, Balgownie Primary School OP6, Aberdeen College OP7, Balgownie Home Farm OP11, "One" Sport Centre OP12 and AECC Bridge of Don OP13)**
New 16 GP Health Centre **(including land)** to accommodate existing four GP Practice with **12** additional GP's, **support staff and other primary care support services.** Two new six chair Dental Surgeries. Four new Community Pharmacies.	**Zone 2** – Grandhome **OP9**
New **11** GP Health Centre (including land) to accommodate eight existing GP's with **3** additional GP's, **support staff and other primary care support services.** One new Community Pharmacy	Stoneywood **OP17, Former Carden School Dyce OP15, (Support from housing development in Newmachar within the Aberdeenshire LDP is also sought as primary care services are provided from Dyce)**
New **15** GP Health Centre (including land) to accommodate 6 existing GP's with **9** additional GPs, **support staff and other primary care services.** **Two** new Community Pharmacies.	Zone 3 – Newhills Expansion – **Craibstone South OP20, Rowett South OP21, Greenferns Landward OP22 along with contributions from Bankhead Academy OP14, Davidson Papermill OP16** **(Support from housing development in Blackburn within the Aberdeenshire LDP is also sought as primary care services are provided from Bucksburn Practices)**
Provision of Healthy Hoose in	**Contributions from Woodside**

Woodside area	**Op25, Haudagain Triangle OP65, Manor Walk OP66, Hilton Nursery OP84 and Smithfield Primary OP89**
New 6 GP Health Centre (including land) to accommodate 4 existing GPs with 2 additional GPs, **support staff and other primary care services including dental chairs**	Zone 4 – Greenferns **OP28 and OP33**
Extension at Kingswells Health Centre to accommodate **2** additional GP's, **support staff and other primary care services.**	Kingswells **OP30**
New 9 GP Health Centre (including land) to accommodate 7 existing GPs with 2 additional GPs, support staff and other primary care services.	**Zone 5 – Maidencraig South OP31 and Maidencraig OP32, along with contributions from Grenfern Infant OP27, Burnside OP37, Summerhill Academy OP93**
New **7** GP Health Centre (including land) including support staff and other primary care services **to support the population in this new community.** Two new Community Pharmacies.	**Zone 6** – Countesswells **OP38**
Extension to the existing **Cults** Health Centre to support the General Medical Services **with an additional GP, support staff and other primary care services** in the Cults community.	**Zone 7** – Friarsfield OP41, **along with contributions from Braeside OP39, Cults and Pumping Station OP40**
Extension to Peterculter Health Centre to accommodate one additional GP, **support staff and other primary care services.** One new Community Pharmacy.	Oldfold **OP48 along with contributions from Kenerty Mill OP42, Milltimber Primary OP43, Peterculter East OP45, Culter House OP46, Edgehill Rd OP47, Petercultuer Burn OP51, Malcolm Rd OP52, Mid Anguston OP108 and Woodend Peterculter OP109**
Extension to Cove Bay Health Centre to accommodate **3** additional new GPs**, support staff and other primary care services.**	**Zone 8** – Loirston OP59 **along with Cove OP56, Stationfields OP58**

One new Community Pharmacy **in the Loirston development.**	

Summary of response (including reasons) by planning authority:

Background

From the outset of the review of the extant Local Development Plan (CD42), the Council has taken a proactive approach by identifying infrastructure required to support new development. This process has involved working with a range of organisations through the Future Infrastructure Requirements for Services (FIRS) Group to assess the capacity of existing infrastructure and its ability to cope with new development in each area of the City, and to then assess additional infrastructure required.

Proposed Plan Policy I1 – Infrastructure Delivery and Planning Obligations and Appendix 3 set out the broad principles including the items for which contributions will be sought and the occasions when they will be sought. Additional detail on the methodology used and the criteria that should be used to calculate developer contributions is provided in the Proposed Supplementary Guidance (CD25). The Proposed Action Programme (CD21) outlines further details on the delivery of supporting infrastructure. Both the Proposed Supplementary Guidance and Action Programme can be updated to take account of changing circumstances as sites come forward. We propose to carry forward the same broad approach and principles from the extant Local Development Plan into the Proposed Plan, with some minor updates and wording changes.

The Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) proposed not to allocate additional land, but to 'roll forward' the allocations from the Aberdeen City and Shire Structure Plan 2009 (CD20) into the SDP, and this was accepted by the Reporter during the SDP's Examination. The Reporter's conclusion stated that "Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013." Aberdeen City Council agree with these conclusions. As a reflection, the vast majority of sites identified in the Proposed Plan have also been 'rolled forward' and, as such, Appendix 3 with the Proposed Plan has not changed significantly from Appendix 4 within the extant Plan.

General

148: Stoneywood has been removed as a Masterplan Zone as it is well progressed in its construction. However, it remains appropriate to retain the infrastructure requirements for Stoneywood within Appendix 3 as not all of the requirements have been met or completed.

Cumulative Transport Infrastructure

183: A description is provided within Appendix 3, underneath the Cumulative Transport Infrastructure heading, as "Contributions required in order to address the cumulative impact of development on the transport network". The Strategic Transport Fund schemes referred to by the respondee are listed on page 36 of the Proposed Plan under section "Managing the Transport Impact of Development" at paragraph 3.44. The projects were identified by the Aberdeen City and Shire Strategic Development Planning Authority (SDPA) in conjunction with both Aberdeen City and Aberdeenshire Councils, the North East of Scotland Transport Partnership (Nestrans) and Transport Scotland. The issue raised by the Respondent was covered by the Aberdeen City and Shire Strategic Development Planning Authority in response to a representation to the Draft Strategic Transport Fund Supplementary Guidance. The Supplementary Guidance (CD19) was adopted by the SDPA on 25 June 2015 and has since been ratified and is being implemented by both constituent Councils. Section 4 of the Supplementary Guidance "Who will be expected to contribute" provides further detail. An additional paragraph (4.9) was added to the draft Supplementary Guidance prior to its adoption, in response to representations received during its consultation period, to clarify the issue raised by the respondent with regards to local vs strategic contributions and "double counting".

Update to Reflect Masterplans/Planning Permissions/Legal Agreements

General

149: When comparing Appendix 4 of the extant Local Development Plan and Appendix 3 of the Proposed Plan there are two differences in the requirements listed for Masterplan Zones. Both changes relate to Newhills expansion and a reduction in the requirement for education. The Proposed Plan clarifies that there is no requirement for a new secondary school at Newhills, and that only two new primary schools are now required (not three as stated in the extant Plan). This change has been made through extensive consultation with the Council's Education Service, and reflects the updated position as stated within the Newhills Development Framework Supplementary Guidance which was adopted on 9 January 2015.

85, 101, 149, 183: The majority of the Proposed Plan sites have been 'rolled forward' from the extant Local Development Plan (CD42), and the majority of these have agreed Development Framework/Masterplans, planning consents and/or have begun construction. Similarly, the infrastructure requirements for Masterplan Zones have also been 'rolled forward'. As discussed above, the identification of infrastructure requirements listed in Appendix 3 was part of a proactive approach to highlight infrastructure requirements as a result of new development at an early stage in order to inform the development industry of areas where contributions may be required. Appendix 3 provides a snap shot in time of up-front likely infrastructure requirements which would then be assessed and evaluated further through the Masterplanning and planning application processes. Subsequent site specific detail is provided in the Proposed Action Programme (CD21) which outlines detail regarding the delivery of supporting infrastructure. The Proposed Action Programme also reflects the detail of planning permissions and legal agreements signed under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended ('Section 75 agreements') (CD02) with regards to the provision and phasing of infrastructure. It is therefore not considered necessary to amend Appendix 3 of the

Proposed Plan to reflect specific planning permissions/Section 75 agreements as they supersede the information contained within the Appendix. The Action Programme remains the most appropriate vehicle to provide up to date "live" information with regards to the delivery of sites in the Local Development Plan.

Health

148: As detailed above, the vast majority of sites identified in the Proposed Plan have been 'rolled forward' and, as such, Appendix 3 of the Proposed Plan has not changed significantly from the extant Plan. The FIRS group (including NHS Grampian) were engaged with during the Plan preparation process. Infrastructure requirements were assessed in conjunction with a range of organisations through the FIRS group. It is not considered appropriate to now amend the requirements identified in Appendix 3 where the majority of sites already have agreed

Development Frameworks/Masterplans/Planning Permissions and Section 75s. Furthermore, the Development Frameworks/Masterplans have been agreed as statutory Supplementary Guidance to the Local Development Plan 2012. It would therefore not be reasonable to apply different requirements to sites which are already considerably progressed and have their infrastructure requirements firmly established. As detailed above, the Action Programme reflects the most up-to-date position with regards to infrastructure delivery.

Strategic Wastewater Infrastructure

76: Scottish Water's comments regarding exploration of opportunities in delivering strategic wastewater infrastructure in addition to water infrastructure to meet cumulative demands of developments are noted.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	APPENDIX 4 - MASTERPLANS	41
Development plan reference:	Page 94	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Susanne Stevenson of Scottish Water (76)
Mr Michael Lorimer of Ryden LLP on behalf of Robert Gordon University (77)

Provision of the Development Plan to which the issue relates:	List of Masterplan sites

Summary of the representation(s):

76: Scottish Water support the use of the Masterplanning process to aid the delivery of larger or complex sites.

77: The Robert Gordon University Garthdee Campus Masterplan document should be retained as Supplementary Guidance. There are still a number of sites within the Masterplan which need to be built out.

Modifications sought by those submitting representations:

77: Add the Robert Gorgon Masterplan: Garthdee Masterplan to the list of Supplementary Guidance.

Summary of response (including reasons) by planning authority:

76: We acknowledge the support for the Masterplan process.

77: With regard to The Robert Gordon University Garthdee Campus Masterplan this document has been removed from the list of Supplementary Guidance in Appendix 4. The decision was taken to rationalise the number of supplement documents attached to the Local Development Plan. The site Supplementary Guidance documents taken forward are those in multiple ownership and/or when development has yet to take place on site. The Robert Gordon University Garthdee Masterplan will still be associated to the Local Development Plan and will have the status of local planning advice. The document will be a material consideration when determining planning applications in this location.

Reporter's conclusions:
Reporter's recommendations:

Issue (ref and heading):	ACTION PROGRAMME AND MONITORING	42
Development plan reference:	Paragraphs 1.12, 3.33, 3.34, and 4.3. Policy I1 and page 73.	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Susanne Stevenson of Scottish Water (76)
Ms Lavina C. Massie on behalf of Culter Community Council (98)
Mr Peter Roberts of Cults, Bieldside & Milltimber Community Council (102)
Mr Abdul Latif of The New Aberdeen Mosque and Community Centre Project (116)
Mr Mike Williams of Scott Hobbs Planning on behalf of Scottish Enterprise (120)
Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148)

Provision of the Development Plan to which the issue relates:	Continual monitoring and reviewing of the Plan and associated documents.

Summary of the representation(s):

Water/Wastewater

OP8 - East Woodcroft North

76: This small development will have no real impact on water or wastewater infrastructure.

OP9 - Grandhome and OP31 - Maidencraig

76 The developer does not need to wait until they have received full planning permission to submit an application to connect. We would actively encourage developers to submit a Pre Development Enquiry form.

OP18 - Craibstone North and Walton Farm and OP20 - Craibstone South

76: OP18 and OP20 have been combined in the Action Programme but a separate comment has also been duplicated for OP18 and this could perhaps be removed. Scottish Water's Development Impact Assessment has now been superseded by our Pre Development Enquiry form. The developer will be notified if a Water Impact Assessment or Drainage Impact Assessment is required for their site in our response to the enquiry.

OP21 - Rowett South

76 The water and wastewater comments for this site appear to be under a duplicate entry of OP20. As the site is still named Rowett South it is most likely the reference number just needs to be updated.

OP41 - Friarsfield and OP59 - Loirston

76: The developer has completed a Water Impact Assessment for this site.

OP59 - Prime Four Extension

76: A Water Impact Assessment and Drainage Impact Assessment will be required for this site.

OP108 - Mid Anguston

76: This site may require a flow and pressure test as it is situated at the end of the network. Internal water storage would also be recommended within each property. There is a small septic tank here but there is currently zero capacity. Should the development wish to connect, Scottish Water will initiate a growth project once our 5 Growth Criteria are met.

OP109 - Woodend Peterculter

76: Each property will require internal water storage. There is no sewer infrastructure in the vicinity, so a sewer mains extension will be required to connect to the public system.

Planning Gain/Developer Contributions

98 Vital to collect data on planning gain/developer contributions to ensure they are being developed and in the required time frame.

Other Infrastructure

OP41 - Friarsfield

102: A sentence should be added outlining the completed condition of the full link road between Kirk Brae and Craigton Road. And the provision of affordable housing under planning application 140272.

OP85 - Mosque

116: The phrase “with interested parties” does not properly reflect the position.

City Centre Masterplan and Delivery Programme

120: Greater emphasis needs to be placed on the on the fact that funding mechanisms are to be identified and the Delivery Plan is to be implemented as a matter of urgency, along with funding and delivery of better public transport to and around the city centre.

Aberdeen Airport

120: Support identification of land for employment use and the identification of necessary infrastructure. The Plan needs to provide a more proactive positive framework to highlight the importance of the employment land allocations adjacent to the Airport.

Harbour Extension

120: Measures should be introduced to seek delivery of the necessary infrastructure to facilitate the Harbour Expansion.

Healthcare

148: The Action Programme does not provide enough detail in relation to the contributions required to have healthcare facilities in housing sites out with the Masterplan Zones.

Modifications sought by those submitting representations:

OP85 - Mosque

116: The wording for the entry on page 57 should be changed to: “The New Aberdeen Mosque and Community Centre: negotiations to progress the project are being advanced".

City Centre Masterplan and Delivery Programme

120: Amend the Plan to place greater emphasis on identifying and securing funding mechanisms and delivery of essential infrastructure to secure the implementation of the City Centre Masterplan.

Aberdeen Airport

120: Revisions to the Action Programme to give priority to the implementation of the Masterplans within this growth zone, ensuring the delivery of the necessary infrastructure with innovative funding mechanisms

Harbour Expansion

120: Revisions to give priority to the implementation of the Masterplan for the Nigg expansion and development of associated employment land, ensuring the delivery of the necessary infrastructure with innovative funding mechanisms

Healthcare

148: Healthcare requirements for housing sites outwith the Masterplan Zones should be specifically recognised in the Action Programme.

Summary of response (including reasons) by planning authority:

The Proposed Action Programme (CD21) itself is not subject to Examination but it was felt the comments submitted on this topic should be passed to the Reporters' Unit to ensure a holistic approach was taken. The Proposed Action Programme will be update and adopted within three months of the adoption of the Aberdeen Local Development Plan 2016, as is required by Regulation 21 (8) of Planning etc. (Scotland) Act 2006 (RD08). Should the sites below still be included in the Plan post the Examination period then the information below will be inputted as noted. Our intention is to update the Action Programme three to four times a year to ensure it becomes a user friendly, workable, fit for purpose document. Monitoring will be carried out on a regular basis to assess policies and their usefulness.

Water/Wastewater

76: We note the small impact OP8 - East Woodcroft North will have on water or wastewater infrastructure. We note that OP9 - Grandhome and OP31 - Maidencraig can submit a Pre-Development Enquiry form and are actively encouraged to do so. We note the duplication of information regarding OP18 - Craibstone North and Walton Farm and we will rectify this. The reference to Scottish Water's Development Impact Assessment will be changed to Pre-Development Enquiry Form and will note that the developer will be notified if a Water Impact Assessment or Drainage Impact Assessment is required for their site in Scottish Waters response to the enquiry. We note the misnaming of site OP21 - Rowett South as OP20 - Rowett South and will rectify this. We note OP41 - Friarsfield and OP59 - Loirston have completed a Water Impact Assessment. We note a Water Impact Assessment and Drainage Impact Assessment are required for site OP59 - Prime Four Extension. We note site OP108 - Mid Anguston may require a flow and pressure test as it is situated at the end of the network. Internal water storage would also be recommended within each property. There is a small septic tank with no capacity - should the development wish to connect Scottish Water will initiate a growth once the 5 Growth Criteria are met. We note OP109 – Woodend, Peterculter will require internal water storage. There is no sewer infrastructure therefore a sewer mains extension will be required to connect to the public system.

Planning Gain/Developer Contributions

98: Aberdeen City Council monitor policy usage on a monthly basis. The data collection and monitoring of planning gain/developer contributions is captured from legal agreements prepared under Section 75 of the Town and Country Planning (Scotland) Act 1997, as amended ('Section 75 agreements') once these are signed. This information is then inputted in to the Action Programme. With regard to affordable housing we intend to continue this practice. Further monitoring is also been investigated, such as the capture of the types and tenure of affordable housing being developed onsite, this will be a joint monitoring between the Council's Local Development Plan Team and Housing Teams.

Other Infrastructure

OP41 - Friarsfield

102: We note a reference should be added outlining the completion of the planning application condition relating to the full link road between Kirk Brae and Craigton Road, and the 12 affordable units.

OP85 - Mosque

116: The change of wording to read, "The New Aberdeen Mosque and Community Centre: negotiations to progress the project are being advanced" has been noted. The Action programme will be updated accordingly.

City Centre Masterplan and Delivery Programme

120: The delivery of the City Centre Masterplan and Delivery Programme (CCMP&DP) is to be carried out by a specific City Centre Masterplan Delivery Team. The projects identified within the CCMP&DP are expected to be programmed into a number of future Local Dvelopment Plans, as the CCMP&DP runs beyond the scope of a Local Development Plan. The relevant Action Programmes will be updated, taking their lead from the City Centre Masterplan Delivery Team.

Aberdeen Airport

120: It is the Council's intention that the Masterplans within the area around Aberdeen Airport, including the Newhills Development Framework, will be (re)adopted as Supplementary Guidance to the Aberdeen Local Development Plan 2016 once adopted. The Newhills Development Framework outlines phasing and delivery within Section 6 of the document. Appendix 3 of the Proposed Plan outlines the infrastructure required in this area. The delivery of the infrastructure will be through a combination of Section 75 agreements, Strategic Transport Fund (CD19) (Supplementary Guidance to the Aberdeen City and Shire Strategic Development Plan 2014) contributions, input from the National Health Service and the Council. It is expected that the Newhills Development Framework will be implemented; therefore prioritising the implementation of the document would not be required. All development areas in the city contribute to the overall aim of ensuring Aberdeen is an even more attractive, prosperous and sustainable European City Region and an excellent place to live, visit and do business. The Action Programme will not be updated to give priority to this Development Framework.

Harbour Extension

120: The Aberdeen Harbour Board are currently preparing a Development Framework for a extension of Aberdeen harbour at Nigg Bay. This document will outline phasing. The delivery of the infrastructure will be through a combination of Section 75 agreements, Strategic Transport Fund contributions, and the Council's commitments. It is expected that the Development Framework will be implemented therefore prioritising the implementation of the document would not be required. All

development areas in the city contribute to the overall aim of ensuring Aberdeen is an even more attractive, prosperous and sustainable European City Region and an excellent place to live, visit and do business. The Action Programme will not be updated to give priority to this Development Framework.

Healthcare

148: The healthcare requirement detail in the Action Programme is provided by the NHS Grampian. Data on healthcare facilities from non-Masterplan Zone sites when forthcoming from the NHS will be programmed into the Action Programme.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	HABITATS REGULATIONS APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT ENVIRONMENTAL REPORT	43
Development plan reference:	Paragraph 2.6	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Nina Turner of Scottish Natural Heritage (54)
Mr Abdul Latif of The New Aberdeen Mosque and Community Centre Project (116)
Mr Fraser Littlejohn of Montagu Evans LLP on behalf of Buccmoor LP (160)
Mr Johnathan Whittlestone of Strategic Environmental Assessment Gateway on behalf of Historic Scotland, Scottish Natural Heritage and Scottish Environment Protection Agency (184)

Provision of the Development Plan to which the issue relates:	Identifies key environmental issues, assesses significant effects and mitigations where appropriate

Summary of the representation(s):

Strategic Environmental Assessment

General Support for Scope and Content

54, 184: Key environmental issues have largely been correctly identified, and the assessment of likely significant effects has largely been carried out satisfactorily.

54: The Strategic Environmental Assessment correctly identifies a clear need for the plan to address possible adverse effects on the River Dee Special Area of Conservation.

Assessment of Impact OP85 King Street/Beach Esplanade

116: Believe that the negative impact of development this site on all of the indicators has been overstated, and that a number of factors have not been considered which would serve to lessen or remove such impacts. In some cases, the development would actually have a positive effect.

Minor Amendments Requested by Consultation Authorities

54, 184: A number of minor amendments and wording changes to the Report and the assessment of Policies and sites are recommended, as detailed in representations. These relate primarily to Mitigation Measures identified and the treatment of individual site assessments.

Habitats Regulations Appraisal

Assessment of Impact of Water Abstraction on River Dee Special Area of Conservation

54: Do not consider that the Habitat Regulations Appraisal Record has demonstrated that there would be no adverse effect on the integrity of the River Dee Special Area of Conservation. Supporting information from Scottish Water and/or Scottish Environment Protection Agency on future abstraction levels may enable a future iteration of the Habitat Regulation Appraisal Record to demonstrate that there will be no adverse effect on the integrity of River Dee Special Area of Conservation.

Modifications sought by those submitting representations:

Strategic Environmental Assessment

Assessment of Impact OP85 King Street/Beach Esplanade

116: The assessment of this site should be changed to indicate that the impact of development will have no detrimental impact, or be minimal.

Minor Amendments Requested by Consultation Authorities

54, 184: Various minor amendments and detailed wording changes requested.

Summary of response (including reasons) by planning authority:

Strategic Environmental Assessment

General Support for Scope and Content

54, 184: Support noted.

Assessment of Impact OP85 King Street/Beach Esplanade

116: The assessment of this site was carried out by Officers in accordance with internal guidance and was consistent with the assessment of all other sites in the Proposed Plan. Although the assessment identifies some potential negative impacts, this is to be expected as all development will have some degree of negative impact on the environment. Overall, these effects were not considered to be very significant. As such, the site is considered to be suitable for development and has been allocated as a Proposed Opportunity Site within the Proposed Plan.

Minor Amendments Requested by Consultation Authorities

54, 184: All of the suggested amendments have been assessed and actioned. See

RD01 Strategic Environmental Assessment and RD02 Habitats Regulations Appraisal for a full account of the changes required and how the changes have been made.

Habitats Regulations Appraisal

Assessment of Impact of Water Abstraction on River Dee Special Area of Conservation

54: Aberdeen City Council met with and wrote to Scottish Water asking if they could address concerns over the amount of proposed development in both Aberdeen City and Aberdeenshire and the possible impact this may have on licenced water abstraction levels from the River Dee. Scottish Water confirmed in writing (RD73) that taking into consideration all proposed developments in the two Local Development Plans, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. The following passage has been added to the relevant sections of the Habitats Regulation Appraisal (CD27), "Taking into consideration all proposed developments in both the City and Shire Local Development Plan's, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. Therefore, we do not foresee the need to change the CAR Licence limit in response to growth anticipated in the North East."

SHN confirmed by email that they are satisfied with this approach (RD74) and that the Proposed Plan will not adversely affect the integrity of the sites listed in this assessment.

Reporter's conclusions:

Reporter's recommendations:

Issue (ref and heading):	MISCELLANEOUS	44
Development plan reference:	N/A	

Body or person(s) submitting a representation raising the issue (reference no.):

Ms Mhairi Johnston (69)
Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85)
Mr Alasdair Morrison of GVA James Barr on behalf of F&C REIT Asset Management (87)
Mr George Wood of Old Aberdeen Community Council (100)
Clare Pritchett of Scottish Environment Protection Agency (124)
Mr Blair Melville of Homes for Scotland (149)

Provision of the Development Plan to which the issue relates:	N/A

Summary of the representation(s):

Mitigation, Public Consultation and Equalities Assessment

69: It is concerning that the public consultation stage of planning is meaningless, if all concerns can be answered by "mitigation measures" to address adverse effects. What is the point of allowing representations, and how is it a "fair hearing" if all concerns can be answered in this way? 'Mitigation' is a way of getting round objections. There is a lack of clarity and accountability to the process.

69: Equality and Human Rights Impact Assessment (EHRIA) appears to have been completed as a 'tick box' exercise and not given any serious and meaningful consideration. It is clearly not true to say that there will be no impacts on people with protected characteristics, or that there will be no potential to interfere with the human rights highlighted. It is completely inaccurate to suggest that the very fact of consultation is satisfactory evidence for no likely impact on citizens, with protected characteristics or otherwise.

Supplementary Guidance

85: Proposed Plan is concise and relatively easy to read, when taken with the Supplementary Guidance it becomes a cumbersome document.

149: Generally, the Plan does not include some policy matters contained in Supplementary Guidance, notably around periods for which the Council will retain monies and mechanisms for holding and accounting for monies. There is also no justification in the Supplementary Guidance for the costings for facilities.

The Reporters are requested to scrutinise all Supplementary Guidance to ensure

that policy requirements are included in the Plan.

Retail Study

87: Over reliance on achieving the quantitative capacity or 35,000 square metres may lead to pressure to grant permission to retail floorspace in out-of-centre locations. A spatial balance is required to meet this large scale retail capacity in order that parts of the city centre are not disadvantaged by over concentration in one location and that the entire city centre strategy is taken into account in such decisions on large scale investment. This is particularly the case in terms of the long term future of Union Street as a retail and visitor location.

Transport

100: Many of the headings in this Plan relate to traffic movements and a holistic plan for all traffic within the Aberdeen area is long overdue. As part of this plan, Aberdeen City Council and other bodies should undertake long-term traffic management planning for the whole area and design meaningful traffic routing to allow the development of co-ordinated traffic routes throughout the area.

100: Section 2.20 lists the Aberdeen Western Peripheral Route, Third Don Crossing and Haudagain roundabout improvements, although these are essential to development they are not the ultimate transport solution. Emphasis must be placed on the city's links to these routes and more importantly to public transport, rail links and dedicated cycle routes.

Website Links

124: Links to SEPAs website pages in the Proposed Plan no longer work as SEPA's website has been updated. Reference should be made to the Scottish Environment Protection Agency (not Environmental as at para 3.110).

Modifications sought by those submitting representations:

Equality and Human Rights Impact Assessment

69: That this assessment is completed more fully and accurately, with reference to more specific evidence which would demonstrate that the Assessor has taken time to reflect meaningfully on impacts before completing the assessment, and which would result in a document that actually serves the purpose for which it was intended.

Supplementary Guidance

149: The Reporters are requested to scrutinise all Supplementary Guidance to ensure that policy requirements are included in the Plan.

Summary of response (including reasons) by planning authority:

Mitigation, Public Consultation and Equalities Assessment.

69: Virtually all development, from replacement windows to new roads and communities, will have some impact. Many of these impacts are positive – providing homes to live, employment areas to work, open spaces to play, places to shop and roads, paths and cycleways to move between these places. Development will also have negative impacts. Mitigation is the term we use to describe the policies and processes we apply to either eradicate or reduce these impacts.

The planning system looks to respect the rights of the individual whilst acting in the interest of the wider community. In doing so, we assess the effects that a proposal will have on individuals and weigh these against the wider public interest in determining whether development should be allowed to proceed.

An Equality and Human Rights Impact Assessment (EHRIA) is a tool that helps to systematically consider relevant evidence that we can test against proposals that may have an unfair or unequal effect on different groups of people within the community. It is not designed to test the effects of a proposal on the public as a whole. Instead, it asks us to:

• Ensure that the proposal does not discriminate;

• Consider how the proposal might better advance equality of opportunity; and

• Consider whether the proposal will affect relations between different groups.

We do not consider that the Proposed Plan, or the consultation process around it discriminates against any groups with protected characteristics. Our consultation arrangements are set out in the Participation Statement (CD48) and are considered robust. The amount of background information accompanying the Proposed Plan is substantial. This reflects the importance of a document which will guide the development of Aberdeen for the next five years and which will have consequences well beyond that. Checks and balances are inherent in the system to ensure fairness – from the assessment by professional Officers, consideration by democratically Elected Members, through to the scrutiny of independent Reporters. Further opportunities to comment on proposals also exist at the Masterplan stage (when carried out) and when planning applications are submitted.

Supplementary Guidance

85: We acknowledge that our Supplementary Guidance (CD25) can be difficult to penetrate due to the number and length of the documents. The extant Local Development Plan 2012 has 30 associated Supplementary Guidance documents covering individual topic areas such as affordable housing, flooding, and householder development. The Scottish Government has recently raised concerns

with Planning Authorities over the volume of Guidance that is being produced. We believe that the policy content of the documents we have remains relevant and helps to ensure a consistent approach in dealing with planning applications. However, having 30 separate documents means that there is currently a lot of repetition in terms of introductions, preambles, contact details and so on. We have therefore merged the Supplementary Guidance into one suite of documents, ordering the individual Supplementary Guidance into broader topic areas which reflect those in the Local Development Plan. This means that the detailed policy content of the Guidance remains intact, but the overall volume is much reduced. This should make it easier to find those parts of the Supplementary Guidance which are relevant to a particular proposal.

We also propose to reduce the number of Planning Briefs and Masterplans which will be adopted as Supplementary Guidance. These are listed in Appendix 4 of the Proposed Plan (on page 94) and are generally restricted to very large and often complex sites. All other Masterplans and Planning Briefs will be taken forward as non-statutory planning advice.

Retail Study

Paragraph 5.27 of the Aberdeen City and Aberdeenshire Retail Study 2013 (CD16) acknowledges this issue. It states that the scale of potential floorspace for Aberdeen city centre identified in this quantitative analysis is 60-65,000 square metres (gross floor area) by 2017. This is a result of both significant available expenditure growth and market forces favouring major centres. The Study (paragraph 5.27) explains that over the past decade, the net increase in comparison floorspace in the city centre has been approximately 37,000 square metres (gross floor area). However, with lower growth rates forecast it is difficult to consider that this scale of new floorspace could be developed in the city centre over this period. It is more likely that the limitations imposed by the numbers of operators interested in investing in Aberdeen (either now or in the future) and the practical difficulties associated with bringing new floorspace forward will act as a constraint to new floorspace development rather than the growth of expenditure.

The Study looked at various scenarios to deal with this issue with Scenario 3 being favoured (paragraphs 5.40 to 5.58). This looks to address deficiencies plus allow city centre development. This includes all development identified within the “Do Minimum” scenario plus meeting all retail deficiencies identified together with 30,000 square metres (gross floor area) floorspace for comparison goods within the city centre. The reduced figure represents a realistic assessment of bringing forward additional floorspace in the city centre balanced against potential market pressure to identify additional new retail locations and the need to protect other existing centres. The details of this preferred retail development strategy are described in the final Section of the Study (Section 6).

The Proposed Plan identifies potential city centre retail opportunities at OP102, OP91, OP67 and OP96. The City Centre Retail Core has been reduced in extent, particularly along the west end of Union Street, to provide more focus. A proposed West End Shops and Cafes policy area (Policy NC3) has been identified to encourage more specialised uses in the area, and the Mixed Use zoning for the west

of Union Street should encourage a greater flexibility of uses there. There are also considered to be opportunities to expand the existing centres with a proposal to expand Union Square (151362) pending for example. The focus of Proposed Plan Policies NC1 to NC6 is very much focussed on retaining Aberdeen City Centre as the Regional Centre and directing development to and protecting this and other existing Centres. New retail development is proposed for some of the new communities at Newhills, Grandhome and West Aberdeen/Countesswells (see Proposed Plan paragraph 3.28) and at a bulky goods retail park at Denmore Road (OP75). Overall it is considered that this represents a realistic and balanced approach to retail planning in Aberdeen over the lifetime of the Plan which serves to:

• Retain and expand the City centre's regional status;• Protect existing centres;• Identify appropriately scaled retail opportunities related to major new communities; and,• Resist out of centre and speculative development.

Transport

100: Overall transport policy is dealt with in the North East of Scotland Transport Partnership (Nestrans) Regional Transport Strategy (2014) (CD15) and the Aberdeen Local Transport Strategy (LTS) (2008) (RD34). The Consultative Draft Aberdeen City Local Transport Strategy (Draft LTS) 2015-2020 (CD34) has been developed to set out the policies and interventions adopted by Aberdeen City Council to guide the planning and improvement of the local transport network over the next five years. It must take into account national and regional transport, planning and economic development policies, as well as being fully integrated with the Council's wider objectives and outcomes.

LTS objectives are reflected in the Proposed Plan, and although an important part of this is the considerable investment in road infrastructure which in now underway. There are proposals to improve public transport outlined in Proposed Plan Policy T1 – Land for Transport and likely projects arising from the Strategic Transport Fund (Supplementary Guidance to the Aberdeen City and Shire Strategic Development Plan 2014) are outlined in paragraph 3.44 of the Plan. In addition, Proposed Plan Policy T3 – Sustainable and Active Travel requires new development to be accessible by a range of transport modes, with an emphasis on sustainable and active travel.

The current LTS was adopted in 2008 and focussed on delivery of the Aberdeen Western Peripheral Route (AWPR) and the opportunities that this new road capacity would afford to reorganise and improve the use of the City's overall road network. Although the current LTS has come to the end of its intended life span, as Aberdeen remains in a pre-AWPR state, much of the content is still relevant and will continue to be so going into the period 2015 to 2020. It has therefore been determined that a fundamental change in the overall policy approach is not required; instead a refresh, reflective of changes to national, regional and local policy more appropriate.

Website Links

124: We will correct the error in paragraph 3.110 and refer to the main SEPA website www.sepa.org.uk only by removing the additional pages. We would regard

these changes as Non-Notifiable Modifications, as listed on CD26.
Reporter's conclusions:
Reporter's recommendations:

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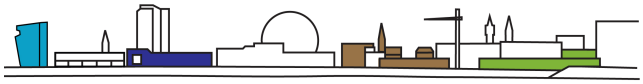


aberdeen local development plan

APPENDIX 3 - Report of Conformity with Participation Statement

Introduction

Aberdeen City Council prepared a Participation Statement explaining when, how and with whom the Council would consult when preparing its new Local Development Plan. The Participation Statement was included in the Local Development Plan Scheme which the Council first adopted in January 2013 and was subsequently revised in January 2014 and January 2015. The Local Development Plan Scheme sets out the Council's programme for preparing and reviewing its Local Development Plan.

We have now prepared this Report of Conformity with the Participation Statement to be submitted with the Proposed Plan and Action Programme to Scottish Ministers. This is to allow an assessment to be undertaken as to whether we have done what we set out to do in respect of consultation. This assessment is carried out by an independent person or persons (Reporters) appointed by Scottish Ministers. The Reporter(s) will consider the Participation Statement, the Report of Conformity and any representations relating to the Council's consultation and public involvement activities.

The Report of Conformity shows how we have met the targets we set in the Participation Statement with the Development Plan Scheme adopted in January 2015. This is shown in the table below.

Key Stages of the LDP Preparation

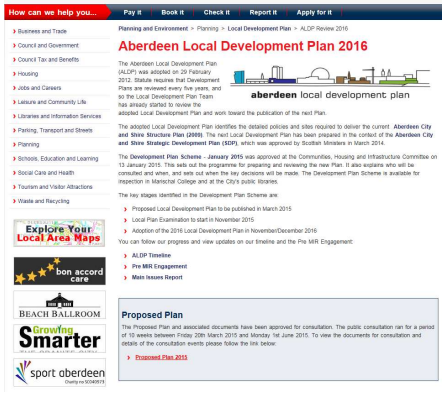
The Local Development Plan Scheme, first approved in January 2013 and subsequently revised in January 2014 and January 2015, set out five stages in preparing the new Aberdeen Local Development Plan. These were:-
Stage 1: Publishing the Local Development Plan Scheme.
Stage 2: Preparing the Main Issues Report.
Stage 3: Preparing and publishing the proposed Aberdeen Local Development Plan.
Stage 4: Preparing for the Examination of the proposed Aberdeen Local Development Plan.
Stage 5: Adoption of the Aberdeen Local Development Plan.

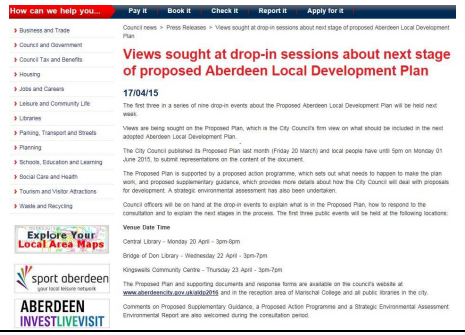
This Report of Conformity covers the period from Stage 3, as Stage 1 and 2 were completed by January 2014 and Stage 4 is yet to begin. It demonstrates that we have carried out consultation on the Local Development Plan in accordance with the commitments made in our Participation Statement within the Development Plan Scheme.

Stage 3: Preparing and publishing the Proposed Aberdeen Local Development Plan

Proposed Plan	
What we said we would do	**What we did**
We will notify any person who commented on the Main Issues Report that the Local Development Plan has been produced and send them the information contained in the notice.	We sent 336 emails and letters to everyone on 17th March 2015.
Send a copy of the Proposed Plan to/inform each key agency and the Scottish Ministers.	Documents and/or letters were sent on 17th March 2015 to: • Scottish Ministers; • Scottish Natural Heritage; • Scottish Environmental Protection Agency; • Scottish Water; • NHS Grampian; • NESTRANS; • Marine Scotland; • Scottish Enterprise; • Historic Scotland; • Transport Scotland; • Aberdeen City and Shire Economic Forum/Regional Advisory Board; • Forestry Commission Scotland; • Aberdeenshire Council; • Aberdeen City and Shire Strategic Development Planning Authority; • Planning Gain; and • All Community Councils in Aberdeen

Proposed Plan	
What we said we would do	**What we did**
Notify the owners, lessees or occupiers of sites and the owners, lessees or occupiers of sites within 20m of sites which the Proposed Plan specifically proposes to be developed and which would have a significant effect on the use and amenity of the site.	Notification was carried out from 20th March 2015 and sent to 11,760 addresses. This was for a total of 110 sites. The notification included a map showing the location of the site, a description of the site, background information, how the person notified could view the plan and information on making a representation.
We will inform community groups and other stakeholders.	We gave presentations to the Civic Forum on 17th February 2015 and the Community Council Forum on 2nd March 2015 to explain the process and consultation arrangements.
Run drop-in events to give people the chance to meet and discuss the Proposed Plan with members of the LDP team.	We held a series of 9 staffed drop-in events at venues across the city, which were held on the following dates: • Central Library, Monday 20th April • Bridge of Don Library, Wednesday 22nd April • Kingswells Community Centre, Thursday 23rd April • Northfield Library, Monday 27th April • Bucksburn Library, Monday 27th April • Cults Sports Centre Complex, Tuesday 28th April • Cove Library, Wednesday 29th April • Torry Library, Wednesday 29th April • Bon Accord, Thursday 30th April •
Make a presentation to key agencies, stakeholders and interested groups.	We invited key agencies to a meeting on 22nd April 2015 to explain the process and consultation arrangements.
Hold a consultation period of 10 weeks, 4 weeks longer than the statutory minimum.	We had a 10 week consultation period running from 20th March 2015 to 1st June 2015.

Proposed Plan	
What we said we would do	**What we did**
Made a copy available to inspect at Marischal College and in all public libraries	Copies of the Proposed Plan, Supplementary Guidance and Response Forms were made available at Marischal College and were sent out to all public libraries in Aberdeen on 17th March 2015. The libraries were also sent posters advertising the drop-in events and CDs (containing the Proposed Plan, Supplementary Guidance, SEA, Action Programme and background documents).
Publish it on our website www.aberdeencity.gov.uk and publicise it through social media.	The Proposed Local Development Plan was made available on the Council's website at:http://www.aberdeencity.gov.uk/planning_environment/planning/local_development_plan/pla_2016_proposed_plan.asp It was also publicised through social media on both Twitter (@AberdeenLDP) and Facebook (Aberdeen Local Development Plan). 

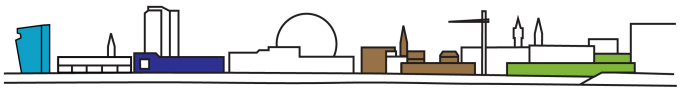
Proposed Plan	
What we said we would do	**What we did**
We will advertise it in newspapers. 15 Public Notices Aberdeen City Council Aberdeen Local Development Plan Proposed Plan Notice of Publication of Documents The Town and Country Planning (Scotland) Act 1997, Section 16 (1) The Environmental Assessment (Scotland) Act 2005, Section 16 (2)	A public notice was published on 18th March 2015 in the Citizen and a second on 20th March 2015 in the Press and Journal (see below and left). A media release was issued on 8th April 2015 then subsequent ones were issued to promote the drop-in events on a weekly basis.  How can we help you... Pay it Book it Check it Report it Apply for it Views sought at drop-in sessions about next stage of proposed Aberdeen Local Development Plan 17/04/15
Email a newsletter about it to agencies, developers and those who have expressed an interest in the Local Development Plan. The Newsletter will also be available on the Local Development Plan pages of our website and publicised over social media.	We distributed the newsletter to c.300 interested parties on 20th March 2015. The Newsletter was made available on the Local Development Plan pages of our website and contained information about the consultation period and events, making a representation and how to view the plan.
We will hold a consultation period of at least 6 weeks to allow representations from any interested party to be made.	Meetings were held with Community Councils on 2nd March 2015 to explain publication arrangements, the engagement process and to offer advice on the next stages. We had a 10 week consultation period running from 20th March 2015 to 1st June 2015. A series of 9 staffed drop-in exhibitions were organised at venues across the city (see the list in the public notice above).

Proposed Plan	
What we said we would do	**What we did**
	An Advice Note detailing how to respond to the Proposed Plan was prepared and widely distributed.

Additional Consultation and Publicity not included within the Participation Statement

Proposed Plan	
Additional Consultation and Publicity	**What we did**
We sent letters and posters to all schools in Aberdeen.	We sent a letter to all the schools in Aberdeen announcing the start of the Proposed Plan, Proposed Action Programme, SEA Environmental Report, and Supplementary Guidance consultation. This also included posters to advertise the consultation and drop-in events.
We sent posters to Community Councils.	We sent posters to 24 Community Councils in Aberdeen advertising the consultation and drop-in events.
We sent letters and posters to Sports Aberdeen facilities and NHS facilities.	We sent a letter to 31 NHS facilities and 21 Sports Aberdeen facilities announcing the start of the consultation. This included posters to advertise the consultation and drop-in events.
We sent letters and a copy of the Proposed Plan to Councillors.	We sent letters and a copy of the Proposed Plan to 43 Councillors announcing the start of the Proposed Plan, Proposed Action Programme, SEA Environmental Report, and Supplementary Guidance consultation.
We sent posters to local supermarkets and shops.	We distributed posters to 16 supermarkets in Aberdeen to advertise the consultation and drop-in events.
We advertised a non-statutory notice in the Press and Journal newspaper.	We advertised a non-statutory notice in the Press and Journal newspaper on 17th April 2015. This included information on the consultation, where to read the Proposed Plan and associated documents and details of the drop-in consultation events.

Appendix



aberdeen local development plan

Proposed Plan – Consultation Responses

Consultation Process

Responses relating to the overall consultation process were received from 1 individual. The comment is also addressed under Schedule 4 Issue 44 - Miscellaneous:-

Comment	Response
It is concerning that the public consultation stage of planning is meaningless, if all concerns can be answered by “mitigation measures” to address adverse effects. What is the point of allowing representations, and how is it a “fair hearing” if all concerns can be answered in this way? ‘Mitigation’ is a way of getting round objections. There is a lack of clarity and accountability to the process. EHRIA appears to have been completed as a ‘tick box’ exercise and not given any serious and meaningful consideration. It is clearly not true to say that there will be no impacts on people with protected characteristics, or that there will be no potential to interfere with the human rights highlighted. It is completely inaccurate to suggest that the very fact of consultation is satisfactory evidence for no likely impact on citizens, with protected characteristics or otherwise.	Virtually all development, from replacement windows to new roads and communities, will have some impact. Many of these impacts are positive – providing homes to live, employment areas to work, open spaces to play, places to shop and roads, paths and cycleways to move between these places. Development will also have negative impacts. Mitigation is the term we use to describe the policies and processes we apply to either eradicate or reduce these impacts. The planning system looks to respect the rights of the individual whilst acting in the interest of the wider community. In doing so, we assess the effects that a proposal will have on individuals and weigh these against the wider public interest in determining whether development should be allowed to proceed. An Equality and Human Rights Impact Assessment (EHRIA) is a tool that helps to systematically consider relevant evidence that we can test against proposals that may have an unfair or unequal effect on different groups of people within the community. It is not designed to test the effects of a proposal on the public

Comment	Response
	as a whole. Instead, it asks us to: • Ensure that the proposal does not discriminate; • Consider how the proposal might better advance equality of opportunity; and • Consider whether the proposal will affect relations between different groups. We do not consider that the Proposed Plan, or the consultation process around it discriminates against any groups with protected characteristics. Our consultation arrangements are set out in the Participation Statement and are considered robust. The amount of background information accompanying the Proposed Plan is substantial. This reflects the importance of a document which will guide the development of Aberdeen for the next five years and which will have consequences well beyond that. Checks and balances are inherent in the system to ensure fairness – from the assessment by professional Officers, consideration by democratically Elected Members, through to the scrutiny of independent Reporters. Further opportunities to comment on proposals also exist at the Masterplan stage (when carried out) and when planning applications are submitted.

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Appendix 4: SEA Comments and Responses

Table 1 below sets out the comments made during the consultation on the SEA Environmental Report, and provides a response and the changes to the Environmental Report recommended.

Table 1: Comments and Responses

Body/Person making comment	Comment	Response	Resulting change
Scottish Natural Heritage	Page 5 Table, Assessment of Environmental Effects, Water Re:*"The overall effects of the plan on water are negative, because all new development requires more water to be taken from the River Dee…"* The implication of this is that the issue needs to be addressed as part of the Habitats Regulations Appraisal (HRA) of the LDP in respect of the River Dee Special Area of Conservation (SAC). It would be helpful to include a reference here to the HRA appraisal, and possibly also to the relevant section of the City & Shire SDP (page 31).	Accepted. Reference has been made to the Habitats Regulation Appraisal and to the relevant section of the Aberdeen City and Aberdeenshire Strategic Development Plan.	Updated assessment.

Body/Person making comment	Comment	Response	Resulting change
Scottish Natural Heritage	Page 42, Table 7.a Significant Effects of the Plan and Mitigation Measures, Biodiversity Under "mitigation/enhancement measures", reference should also be made to the Supplementary Guidance on the Natural Environment, page 11 regarding invasive non-native species (INNS) as a means to mitigate the potential spread of INNS that may otherwise be caused by development, to the detriment of protected areas, protected species, general biodiversity and people.	Accepted. Reference has been made to the relevant Supplementary Guidance	Updated assessment.
Scottish Natural Heritage	Page 47, Table 7.a Significant Effects of the Plan and Mitigation Measures, Water Re: "*All new development will increase the need to abstract water from the River Dee…*" As above, the implication of this is that the issue needs to be addressed as part of the Habitats Regulations Appraisal (HRA) of the LDP in respect of the River Dee (SAC). It would be helpful to	Accepted. Reference has been made to the Habitats Regulation Appraisal and to the relevant section of the Aberdeen City and Aberdeenshire Strategic Development Plan	Updated assessment.

Body/Person making comment	Comment	Response	Resulting change
	include a reference here to the HRA appraisal, and possibly also to the relevant section of the City & Shire SDP (page 31).		
	Re "*Acceptable rates of water abstraction from the Dee are agreed between SEPA and Scottish Water.*", with regard to water abstraction affecting the River Dee SAC, we recommend that consideration is given to including Scottish Water (as well as SEPA) as one of the parties responsible for mitigation. This is because they are responsible for water abstraction and so could be expected to monitor compliance with the relevant water abstraction license(s) for the SAC.	Accepted. Scottish Water have been added to the list of parties involved	Updated assessment.
	In relation to the proposed mitigation, it would be appropriate to add the requirement for HRA (and likely EIA) for master-planning and through the DM and Planning Agreements processes as part of mitigation to avoid	Accepted, text has been added regarding this matter	Updated assessment.

Body/Person making comment	Comment	Response	Resulting change
	adverse effects on the integrity of the River Dee SAC. Notwithstanding the above, the Council will need to be able to confirm, based on up-to-date (and predicted for the levels of proposed development) water abstraction levels information (sourced from Scottish Water) and compliance with licensed abstraction (sourced from SEPA) that any proposed changes in abstraction that would arise from the proposed development allocations is still as described at the time the SDP was drawn up and remains achievable without having an adverse effect on the integrity of the SAC. Please refer to our comments on the HRA record for more details	Aberdeen City Council met with and wrote to Scottish Water asking if they could address concerns over the amount of proposed development in both Aberdeen City and Aberdeenshire and the possible impact this may have on licenced water abstraction levels from the River Dee. Scottish Water confirmed in writing that taking into consideration all proposed developments in the two LDP's, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. SHN confirmed by email that they are satisfied with this approach and that the LDP will not adversely affect the integrity of the sites listed in this assessment.	No Change.
Scottish Natural Heritage	Page 42 – 50, Table 7.a, significant effects of plan and mitigation measures; Soil, Ground contamination With regard to	The second point relates to the digging out of the contaminated site, this would be subject to strict guidelines with are not within planning legislation. Text has been amended to be clearer. The potential requirement for	Updated assessment.

Body/Person making comment	Comment	Response	Resulting change
	"*Mitigation/Enhancement measures*" we find the second bullet point confusing, as we would consider that development on a landfill site is likely to be a planning (and potentially EIA) matter. Clarification of what is meant by this second bullet point would therefore be useful. We note the proposed mitigation (via the Plan policy) in relation to "*Peat Soils*", but advise that is does not appear to follow Scottish Planning Policy concerning development on carbon rich soils, peat and peatland habitats. SPP paragraph 205 does not prohibit development on peat and carbon rich soils, but refers to assessment and minimisation of carbon dioxide release. Further consideration will be required to align the SEA (and LDP policy) with SPP, and then what that would mean for the SEA.	an EIA has been noted. The amendment to the plan made in relation to compliance with SPP is reasonable.	 Updated assessment.
Scottish Natural Heritage	Page 51 – 54, Table 8a: Monitoring Plan, Biodiversity, Impact on water quality of the River Dee and on its qualifying		

Body/Person making comment	Comment	Response	Resulting change
	features With respect to "*When should remedial action be taken*", we recommend adding a measure that remedial action will also be required should the level of water abstraction come close to or exceed the licensed abstraction volume. This is so that future development can be appropriately managed to avoid an adverse effect on the integrity of the River Dee Special Area of Conservation (SAC). With respect to "*who is responsible for undertaking monitoring?*", we recommend that consideration is given to including Scottish Water (as well as SEPA) as one of the parties responsible for monitoring. This is because they are responsible for water abstraction and so could be expected to monitor compliance with the relevant water abstraction license(s) for the SAC.	Aberdeen City Council received an email from SNH on 27 July 2015 confirming they were satisfied the Proposed Sites in both the Aberdeen Local Development Plan and Aberdeenshire Local Development Plan remains acceptable. Should this change acceptable rates of water abstraction should be agreed between Scottish Water and SEPA. Accepted	No change. Updated assessment Updated assessment.

Body/Person making comment	Comment	Response	Resulting change
	With respect to "*where will information be obtained from?*", We recommend adding water abstraction data from Scottish Water and SEPA's monitoring results to the list of information sources.	Accepted	
	With respect to "*when should remedial action be considered?",* we recommend adding a measure that remedial action will also be required should the level of water abstraction come close to or exceed the licensed abstraction volume. This is so that future development can be appropriately managed to avoid an adverse effect on the integrity of the River Dee Special Area of Conservation (SAC). This is because too much abstraction could negatively affect water quality (as well as quantity) within the SAC, which would affect the qualifying interests of the SAC.	Accepted	Updated assessment

Body/Person making comment	Comment	Response	Resulting change
	[On a minor point, the correct terminology for the interests of Natura sites are "qualifying interests" (not qualifying features).]	Accepted	Updated assessment
Scottish Natural Heritage	Appendix 4, 4b, OP 52 Malcolm Road, Peterculter and OP 109 Woodend, Peterculter The SEA states that "*the majority of the site is designated as SNH Ancient Woodland, although it has been felled this designation remains valid*". We do not believe this to be the case - we understand that approximately 80% of the site remains as woodland as at May 2015. The mitigation/enhancement identified is to apply LDP policies on protection of trees and woodland. As around 80% of the site is woodland, if the policies on protection of trees and woodland are applied, we suggest that most of this site is unsuitable for development.	The Malcolm Road site is designated Ancient Woodland. The site was chosen as a preferred option during a Council meeting on 12 November 2013 in regard to the local development plan main issues report. The primary reason being it provided further housing opportunities and would help support the local primary school. Site OP109 was inserted into the local development plan at a Council meeting of 28 October 2015. The primary reason being the site will promote and protect local facilities. Schedule 4 part 1 Paragraph 3 of EIA Regulations (Scotland) 2011 requires population and their interactions with other receptors to be included in environmental assessment. It is this requirement that suggests a human or "socio-economic" dimension to the EIA process. Scottish Planning Policy paragraph 4 notes a core value for the Planning Service is to play a key role in facilitating sustainable economic	No change.

Body/Person making comment	Comment	Response	Resulting change
	The SEA divides OP109 into two sites and for one, identifying that the majority of the site is covered by the "ancient woodland designation". It identifies the need for mitigation as per policy NE8 but should also refer to policy NE5, trees and woodland. If the policies on protection of trees and woodland are applied, we suggest that most of this part of the site is unsuitable for development.	growth, particularly the creation of new jobs and the strengthening of economic capacity and resilience within communities. To facilitate efficient and transparent handling of planning applications, Paragraph 35 of SPP requires applicants to 'provide good quality and timely supporting information that describes the economic, environmental and social implications of the proposal'. These requirements require some form of socio-economic impact assessment. Ideally, environmental assessments follow a hierarchy in dealing with effects. First, it aims to avoid adverse effects; second, if the first option is not possible, it will seek to mitigate the effects. Third if the second option is not possible, it will follow the path of compensation/offset. Paragraph 218 of SPP states, 'The Scottish Government's Control of Woodland Removal Policy includes a presumption in favour of protecting woodland. Removal should only be permitted where it would achieve significant and clearly defined additional public benefits. Where woodland is removed in association with development, developers will generally be expected to provide compensatory planting'.	

Body/Person making comment	Comment	Response	Resulting change
Scottish Natural Heritage	Appendix 4, 4b, OP 62 Aberdeen Harbour expansion Nigg Bay Under biodiversity, consideration of the potential impacts on Atlantic salmon and fresh water pearl mussel needs to be added (as interests of the River Dee SAC), as well as impacts on grey seals of the Isle of May SAC and Berwickshire and North Northumberland Coast SAC, and harbour seals (a protected species). As mitigation, impacts on these interests should be considered in the HRA and EIA for the proposed development when it comes forward. (We understand that the Harbour Authority are aware of the connectivity to the SACs and so should be taking them into account when considering options for the harbor expansion. The HRA for the harbour expansion should therefore ensure that development avoids an adverse effect on the integrity of the Natura sites, and avoids an adverse effect on the population of harbour seals.)	Assess	Consider Atlantic salmon, fresh water pearl mussel, grey seals of the Isle of May SAC and Berwickshire and North Northumberland Coast SAC, and harbour seals to HRA.

Body/Person making comment	Comment	Response	Resulting change
Scottish Environment Protection Agency	We consider that the policies, opportunity sites and supplementary guidance are clearly assessed and we welcome this approach.	Noted and welcomed	No change
Scottish Environment Protection Agency	We consider that the PPS and baseline data listed in Section 5 provide a good background for the plan-making process. We are pleased to note that although the ER only addresses those aspects of the plan which are considered to have significant negative effects on the environment, the issues of construction impacts and impacts on carbon rich soils including peat have been addressed.	Noted and welcomed	No Change
Scottish Environment Protection Agency	We consider that the scope and level of the assessment and the assessment framework provided in the Environmental Report allows us to understand how the conclusions were drawn. We welcome the inclusion of a column detailing site history for all site allocations in the Proposed Plan.	Noted and welcomed	No Change

Body/Person making comment	Comment	Response	Resulting change
Scottish Environment Protection Agency	We note that in our response to the Proposed Plan we have requested text is added highlighting the need for flood risk assessments for certain sites where this is not currently identified (OP1, OP31 and OP80). We therefore request that the Finalised Environmental Report includes this in the site assessments. We consider that we are able to accept the principle of development on flood risk grounds for all the Opportunity Sites.	The amendments to the plan suggested by SEPA to mitigate the flood risk have been accepted and the plan will include these.	No significant changes resulting
Scottish Environment Protection Agency	We welcome how you have outlined the identified mitigation and now this will be achieved in Table 7a (page 42) including who is responsible for undertaking mitigation.	Noted and welcomed	No change
Scottish Environment Protection Agency	We note that under 'Impacts on Watercourses and Waterbodies', reference to watercourses could be removed and the mitigation/ enhancement measures should not just refer to impacts on watercourses but on waterbodies	Accepted	No significant changes resulting.

Body/Person making comment	Comment	Response	Resulting change
	which include wetlands and groundwater dependent terrestrial ecosystem. We have suggested additional wording in Policy NE6 and NE8 and Supplementary Guidance – Natural Heritage to address the impacts on waterbodies and, if incorporated, this should be referenced here.	The reference to waterbodies in relation to Construction Environmental Management Plans in Policy NE8 is sound is sound.	No significant changes resulting
Scottish Environment Protection Agency	The mitigation/enhancement measures under Water – Pollution of Watercourses should reference Pollution of Waterbodies and could also include Policy NE8 and the requirement for a Construction Environmental Management Plan.	Noted	No significant changes resulting
Scottish Environment Protection Agency	We are content with the monitoring proposals as set out the Monitoring Plan.	Noted and welcome	No change
Historic Scotland	We welcome that our previous comments on the environmental report accompanying the Main Issues Report have been acted	Noted and welcome	No change

Body/Person making comment	Comment	Response	Resulting change
	upon and this response should be read in conjunction with our comments issued to that consultation. The updated environmental report clearly sets out the approach to the assessment and the detailed site assessments provided are particularly welcome. We also welcome the efforts that have been made in making the environmental report as understandable as possible. The language utilised helps in explaining the likely environmental effects of the plan and should benefit all readers.		
Historic Scotland	We welcome the assessment for both the Historic Environment Policy and Our Granite Heritage Policy. As you will be aware, we have offered representations on these policies which aim to further clarify the wording but we are content that their context provides for a significantly positive effect on the historic environment.	Noted and welcome	No change

Body/Person making comment	Comment	Response	Resulting change
Historic Scotland	As a general comment on the assessment, while noting that mitigation is required for those effects that are considered to be significant it is beneficial for those sites that have predicted negative effects (significant or otherwise) to offer mitigation. This is particularly beneficial where there is uncertainty regarding the likely effects, notably where a site is scored +/-. Forward thinking mitigation in this regard can help influence the plan and focus proposals to the positive side for the historic environment.	+/- does not indicate there is uncertainty; it indicates there are both positive and negative impacts.	No Change
Historic Scotland	OP63 Prime 4 Business Park Phase 5 Extension We welcome the assessment of the potential effects on the Category C listed Quaker Burial Ground and the subsequent mitigation suggested. However, potential negative effects on the setting of the scheduled consumption dyke should also have been noted here.	Accepted	No significant changes resulting

Body/Person making comment	Comment	Response	Resulting change
Historic Scotland	OP62 Nigg Bay This proposed land use has the potential to have significant effects on the historic environment through the effect on the setting of the scheduled monument St Fitticks Church, the listed Girdleness Lighthouse as well as the potential for archaeological remains within the bay area. This should have been noted in the assessment with appropriate mitigation identified. Furthermore, it noted that the Main Issues Report Policy Alternative Assessment notes a negative impact on the historic environment and states that “without mitigation there is the possibility of development at Nigg Bay affecting the setting of St Fitticks Church which is a Scheduled Ancient Monument and Girdleness Lighthouse which is listed. The assessment of OP62 should echo these findings.	Accepted	No significant changes resulting

Body/Person making comment	Comment	Response	Resulting change
Historic Scotland	OP64 Former Ness Tip While noting that the assessment considers the proposed solar farm is "unlikely to result in the loss of any built or cultural heritage features" it should be noted that there are a number of scheduled cairns in proximity to the development area and as such the proposal has the potential to impact on the setting of these sites. This should have been recorded in the assessment with mitigation options put forward.	Accepted	No significant changes resulting
Historic Scotland	OP102 George Street/Crooked Lane We are concerned with the reference within this assessment that "redevelopment is likely to result in the loss of a single Category C Listed Building". Notwithstanding the fact that such an eventuality should have been scored a significant negative effect we do not consider this statement is appropriate given there is no mention of this within the plan itself	Accepted. Policy D4 and D5 both require the retention and appropriate reuse of buildings. Further to this modifications and demolition of listed buildings would have to satisfy SHEP. The policies have a positive impact on the historic environment.	No significant changes resulting

Body/Person making comment	Comment	Response	Resulting change
	and no application has been made for listed building consent for demolition as we are aware. It is unclear why this presumption has been put forward given the ability of the site to deliver the intended land use while retaining the listed building. We would therefore recommend that the starting point for delivering this site should consider the retention of the building. We would be happy to discuss options for this site with the council.		
	Table 8a: Monitoring Plan We welcome the consideration given to the monitoring of the effects of the plan. The indicator relating to the impact of development on listed buildings and conservation areas is welcomed however, there is no further information within the monitoring plan on how this will be monitored. In light of this you may wish to consider monitoring sites where negative or uncertain impacts	The reference to the Scottish Civic Trust recognises the Trusts objective 5: its Awards and Commendations Scheme by which recognition is given to those who have contributed to the amenity of the city by means of… restoration and preservation of old buildings. The scheme is monitored by ACC to establish of any recent developments in the city have been awarded. The reference will be made clearer.	No significant changes resulting

Body/Person making comment	Comment	Response	Resulting change
	on designations and their settings are predicted. It is also unclear why Scottish Civic Trust have been named as being partly responsible for monitoring the plan.		
Abdul Latif – The New Aberdeen Mosque and Community Centre Project	Detailed comments submitted regarding the SEA of site OP85: King Street/Beach Esplanade making counterarguments to the negative SEA scorings on Air, Water, Soil and Climate, Biodiversity. In relation to Human Health the report states that "There will be both positive and negative impacts on human health due to the loss of open space from the development of the site, and the social inclusion from the development of a new place of worship."	The principle of development and the significant impact of development is assessed by the SEA. Many of the comments submitted relate to design details; the SEA does not assess this level of detail. The proposal will have a negative impact on air during the construction period through dust, due to vehicular access moving to and from the site, and post construction from people visiting the site. Water will be negatively impacted by the need to abstract water during the construction and servicing of the new development, and the potential to release water borne pollutants into the water course. Soil will be sealed and compacted due to the development, and substances may be released during construction and climatic	No Changes

Body/Person making comment	Comment	Response	Resulting change
		factors will include increased energy consumption. There may be a negative impact on biodiverisy due to the loss of open space. Cultural heritage relates to the promotion protection and, where appropriate, enhancement the historic environment. There is no impact. Material Assets and Population is positive and will remain so. Impact on human health will be both positive and negative due to the causes stated in the SEA.	

Appendix 5

Habitats Regulation Appraisal (HRA) Record for Proposed Aberdeen Local Development Plan 2015

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- **1 Background to Habitats Regulations Apprasial (HRA)**

Natura 2000 sites are a network of protected sites of international importance which include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), candidate SACs and proposed SPAs. Under Article 6 (3 & 4) of the European Habitats Directive, any plan, project or strategy (PPS) likely to have a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects, must undergo a Habitats Regulation Appraisal (HRA) to determine its implications for the site. The competent authority can only agree to the plan or project going forward once it has ascertained that it will not adversely affect the integrity of the site concerned (Article 6.3). In exceptional circumstances, a plan or project may still proceed, in spite of a negative assessment, provided there are no alternative solutions and the plan or project is considered to be of overriding public interest. In such cases the Member State must take appropriate compensatory measures to ensure that the overall coherence of the Natura 2000 Network is protected (Article 6.4).

This document comprises a HRA for the proposed Aberdeen Local Development Plan (ALDP) 2015 to analyse the implications of the Plan on the Natura 2000 sites in the area.

- **2 The Aberdeen Local Development Plan (ALDP) 2015**

The ALDP 2015 outlines a vision for the spatial development of Aberdeen City to 2035. It identifies sites for future development, supported by planning policies and supplementary planning guidance, in support of meeting the Plan's vision. This HRA will concentrate on the polices and opportunity sites identified in the Plan, with the Supplementary Guidance subject to a separate assessment forthwith.

- **2.1 Vision and Objectives**

The vision for the ALDP 2015 replicates that of the Aberdeen City and Shire Strategic Development Plan (SDP):

> *Aberdeen City and Shire will be an even more attractive, prosperous and sustainable European city region and an excellent place to live, visit and do business.*
> *We will be recognised for:*
> - *our enterprise and inventiveness, particularly in the knowledge economy and in high-value markets;*
> - *the unique qualities of our environment; and*
> - *our high quality of life.*
>
> *We will have acted confidently and taken the courageous decisions necessary to further develop a robust and resilient economy and to lead the way towards development being sustainable, including dealing with climate change and creating a more inclusive society*.

- **2.2 Policies**

When identifying policies for inclusion in the ALDP, the previous plan (ALDP 2012) has been reviewed, consultation undertaken with members of the public and key stakeholders, and the implications of National Planning Framework 3 (NPF3) and the revised Scottish Planning Policy

(SPP), both published in summer 2014, have been taken into account. The policies to be included, and which will therefore require to be subjected to assessment, are listed in Table 2.1 below.

Table 2.1: Policies in the Proposed Local Development Plan

Policies	Description
Aim	
The Spatial Strategy	
LR1 Land Release Policy	Provides for a phased release of land for housing and employment developments.
LR2 Delivery of Mixed Use Communities	Ensures larger sites include a mix of housing, employment and other uses.
Network of Centres	
NC1 City Centre Development- Regional Centre	Encourages all major footfall-generating uses to locate in the City Centre, according to the sequential approach.
NC2 Retail Core & Union Street	The City Centre Retail Core is the preferred location for all major retail developments. Protects existing retail in the City Centre from change of use.
NC3 West End Shops and Cafes	Protects the West End Shops and Cafes from change of use that would damage the character of the area.
NC4 Sequential Approach & Impact	All significant footfall-generating uses appropriate to town centres should be located in accordance with the hierarchy and sequential approach.
NC5 Out of Centre Proposals	Discourages significant footfall-generating uses from locating outwith designated centres.
NC6 Town, District, Neighbourhood & Commercial Centres	Promotes retail as the preferred use within these designated centres; however a mix of uses is desirable.
NC7 Local Shops Units	Protects local shop units outwith centres from change of use.
NC8 Retail Development Serving New Development Areas	Masterplans for sites allocated for major greenfield residential development should allocate land for retail and related uses at an appropriate scale to serve the convenience shopping needs of the expanded local community.
NC9 Beach & Leisure	Sets out what types of development are appropriate to the Beach and Leisure area, with a presumption against large-scale retail.
Design	
D1 Quality Placemaking by Design	Requires new development to have a strong and distinctive sense of place, demonstrating the six essential qualities of successful placemaking.
D2 Landscape	Requires new development to improve and enhance the setting and visual impact of new development.
D3 Big Buildings	Big buildings must be a high quality design which complements or improves the existing site context.
D4 Historic Environment	Protects, conserves and enhances the historic environment, ensuring new development respects the character, appearance and setting of the historic environment.
D5 Granite Heritage	Seeks the retention and appropriate re-use, conversion and adaptation of all granite features, structures and buildings.
Infrastructure Delivery	
I1 Infrastructure Delivery and Planning Obligations	Development must be accompanied by the infrastructure, services and facilities required to support new or expanded communities and the scale and type of development proposed.
T1 Land for Transport	Safeguards land for strategic transport projects
T2 Managing the Transport Impact of Development	Requires that new developments demonstrate sufficient measures to minimise traffic generated and to maximise opportunities for sustainable and active travel.
T3 Sustainable and Active Travel	New development must be accessible by a range of transport modes

	with an emphasis on active and sustainable transport, and internal layout of new development must prioritise walking, cycling and public transport.
T4 Air Quality	Proposals which may have a detrimental impact on air quality will not be permitted unless measures to mitigate the impact of air pollutants are in place.
T5 Noise	Presumption against noise-generating developments being located next to sensitive developments such as housing. Protects Noise Management Areas and Quiet Areas from noise.
Business & Industrial Development	
B1 Business and Industrial Land	Retains B1 land for business and industrial uses only, with directly supporting facilities, and safeguards it from conflicting development types. New business and industrial developments must safeguard existing residential amenity.
B2 Specialist Employment Areas	Retains B2 land for high-quality office development only, with directly supporting facilities.
B3 West End Office Area	Promotes office development in the B3 area. Requires development proposals to respect the special historic and architectural character of the area.
B4 Aberdeen Airport	Safeguards Aberdeen Airport for airport-related uses and ensures that development across the city does not compromise the safety or operations of the airport or associated radars.
B5 Aberdeen Harbour	Safeguards Aberdeen Harbour for harbour-related uses and other compatible uses.
B6 Pipelines, Major Hazards and Explosives Storage Sites	States that the Council will take account of advice from the HSE in determining planning applications within consultation zones for pipelines, hazards and explosives storage sites.
Housing & Community Needs	
H1 Residential Areas	Safeguards existing residential areas from inappropriate or conflicting development types that would negatively affect residential amenity.
H2 Mixed Use Areas	Ensures that applications within Mixed Use areas take into account the existing uses and character of the surrounding area and avoid undue conflict with adjacent land uses and amenity.
H3 Density	Seeks an appropriate density of development on all housing allocations and windfall sites, with a minimum of 30 dwellings per hectare.
H4 Housing Mix	Housing developments of more than 50 units are required to achieve an appropriate mix of dwelling types and sizes reflecting accommodation needs of specific groups.
H5 Affordable Housing	Housing developments of five units or more are expected to contribute the equivalent of 25% of the total number of units as affordable housing.
H6 Gypsy and Traveller Caravan Sites	Supports sites for Gypsies and Travellers in principle provided certain criteria can be met.
H7 Gypsy and Traveller Requirements for New Residential Developments	Requires certain LDP allocations to make contributions towards the provision of sites for Gypsies and Travellers.
Community Facilities	
CF1 Existing Community Sites and Facilities	Protects existing community sites and facilities for that purpose and supports extensions to community sites and facilities in principle.
CF2 New Community Facilities	Proposals for new community facilities will be supported in principle provided they are convenient and readily accessible.
Natural Environment	
NE1 Green Space Network	Protects areas identified for their biodiversity, habitat and natural heritage value from development.
NE2 Green Belt	Identifies and protects land around Aberdeen from development.
NE3 Urban Green Space	Identifies parks, open space and recreational and sporting facilities and protects them from development.
NE4 Open Space Provision in New Development	Ensures new residential and employment developments make adequate provision of open spaces.
NE5 Trees and Woodlands	Protects areas of trees and woodland from loss or damage through new development and encourages tree planting in new development.

NE6 Flooding, Drainage and Water Quality	Restricts development in areas at risk of flooding, protecting the capacity of the floodplain to store and convey water. It requires SUDS to be incorporated into all new development and makes provision for regional SUDS. New development must make connection to the public sewer. Includes a presumption against excessive engineering or culverting of watercourses.
NE7 Coastal Planning	Safeguards the undeveloped coast from inappropriate development, directing development that requires a coastal location to the most appropriate areas of already-developed coast. Provides safeguards in that any development in the undeveloped coast must also respect and enhance the natural, historical and recreational value of the coast. Development will not be permitted in areas at risk of coastal erosion and flooding.
NE8 Natural Heritage	Describes how designated natural heritage sites and protected species will be considered through the planning process.
NE9 Access and Informal Recreation	Protects the integrity of existing and potential recreational opportunities, particularly access rights and Core Paths, including provision for new and improved public access in new development.
Using Resources Sustainably	
R1 Minerals	States that mineral extraction proposals are acceptable in principle, subject to strict criteria regarding impacts on amenity and the environment. Minerals sites are safeguarded from sterilising development.
R2 Degraded and Contaminated Land	Requires that all degraded or contaminated land is either restored, reclaimed or remediated to a level suitable for its proposed use.
R3 New Waste Management Facilities	Proposals for waste management facilities must comply with the waste hierarchy. Proposals for waste management facilities will be supported provided they meet certain criteria, and existing facilities will be safeguarded from developments that compromise their operation.
R4 Sites for New Waste Management Facilities	Identifies sites safeguarded for the development of new waste-related uses.
R5 Energy From Waste	States that applications for energy from waste facilities should be accompanied by EIA and should consider connection to the electricity grid and ability to provide heat and power.
R6 Waste Management Requirements for New Development	All new developments should have sufficient space for the storage of general waste, recyclable materials and compostable waste where appropriate. Also requires Site Waste Management Plans in some cases.
R7 Low and Zero Carbon Buildings and Water Efficiency	All new buildings must install low and zero-carbon generating technology (LZCGT) to reduce predicted carbon dioxide emissions by at least 20% below 2007 building standards. Also requires new buildings to use water saving technologies and techniques.
R8 Renewable and Low Carbon Energy Developments	Development of renewable and low carbon energy developments will be supported in principle if the technology can operate efficiently and the environmental and cumulative impacts can be satisfactorily addressed. Wind energy developments will also be required to meet stringent environmental and amenity standards.
Communications Infrastructure	
CI1 Digital Infrastructure	All new residential and commercial development will be expected to have access to modern, up-to-date and high-speed communications infrastructure.
CI2 Telecommunications Infrastructure	Proposals for telecommunications infrastructure will be permitted provided they comply with PAN62 in relation to appearance and the environment.

○ 2.3 Supplementary Guidance

Supplementary Guidance provides additional detail on the interpretation and implementation of the policies contained in the LDP. The SG to be included, and which will therefore require to be subjected to assessment, are listed in Table 2.2 below.

Table 2.2: Supplementary Guidance in the LDP

Design Townscape and Landscape	
Windows and Doors	Sets out high-level principles which prioritises the repair and retention of doors and windows, followed by reinstatement and replacement where appropriate. Also describes how technical details should be treated.
Shopfronts and Signs	Provides guidance on the repair and replacement of historic, existing and new shopfronts and signage, in terms of materials, design, security etc.
Big Buildings	Covers the key factors to be considered for new big (tall/bulky) buildings inc. location, site, context, visual impact, uses, environmental issues.
Stone Cleaning	Provides criteria on when the cleaning of listed buildings or buildings in conservation areas will be permitted.
Temporary Buildings	Provides criteria on when permission for portable and demountable buildings will be granted, and the appropriate length for the permission.
Landscape	Guidance on the appropriate use of hard and soft landscaping schemes to enhance new development in both the layout and design and details.
Energetica Design Guide	Provides criteria which developments in the Energetica corridor must meet, relating to standards of design and environmental sustainability.
Design (Modifications to Existing Buildings and Curtilages)	
Householder Development Guide	Principles for all householder developments, as well as guidelines in relation to specific types of development, with the aim of ensuring that development does not erode the character and appearance of our areas.
Sub-Division & Redevelopment	Development guidelines covering built form and townscape, design, materials, amenity, privacy, daylight etc to ensure this type of development does not erode the character and appearance of our areas.
Conversion of Buildings in the Countryside	Provides high-level design principles for the conversion of traditional agricultural buildings and steadings, in relation to both internal and external alterations, to ensure high standards of design.
City Centre Masterplan and Delivery Programme	
City Centre Masterplan and Delivery Programme	*This has been produced but the exact nature of the Supplementary Guidance documents which will be derived from the City Centre Masterplan and Delivery Programme are unknown at this time.*
City Centre (Business)	
Harmony of Uses	Aimed at reducing the scope for conflict between different uses within mixed use areas, for example between residential, offices, food and drink and leisure. Provides criteria where applications will be refused in the interests of amenity, safety and viability.
Serviced Apartments	Provides guidance on the planning issues associated with proposals for Serviced Apartments, including amenity, accessibility, servicing and the requirement for planning obligations.
Hierarchy of Centres	Outlines the hierarchy of centres to be used in assessing applications for significant footfall-generating uses according to the sequential approach.
Union Street Frontages	Aims to maintain an appropriate mix and location of shopping, service and commercial leisure functions on Union Street, by applying minimum percentages of ground floor retail required on each sector of Union Street.

Children's Nurseries	Sets out main planning considerations for development/change of use for children's nurseries in residential and non-residential areas.
Housing and Planning Obligations	
Developer Contributions	Development must be accompanied by the infrastructure, services and facilities required to support new or expanded communities and the scale and type of development proposed.
Affordable Housing	Guidance on the requirements and delivery method of an affordable housing contribution as part of new residential development.
Gypsy/Traveller Sites	Guidance on the planning and design of new sites for Gypsies and Travellers, including spacing, boundaries, health and safety, access, infrastructure etc.
Transport and Infrastructure (Transport)	
Transport and Accessibility	Guidance on how to best consider transport and accessibility issues in development proposals including parking standards, electric vehicle charging points, low-car housing and car clubs, so as to best minimise the traffic impact of a development.
Air Quality	Sets out how air quality management should be considered in the planning process, so as to mitigate against negative effects and improve air quality, particularly within Air Quality Management Areas.
Noise	Sets out how noise issues should be considered in the planning process, so as to mitigate and protect against noise nuisance and pollution, from a variety of sources.
Natural Environment	
Natural Heritage	Describes how designated natural heritage sites and protected species will be considered through the planning process.
Open Space	Provides guidance on the required provision of open space in new development, the maintenance and management of open spaces, the enhancement of the Green Space Network and protection of outdoor access rights.
Trees and Woodlands	Protects areas of trees and woodland from loss or damage through new development and encourages tree planting in new development.
Flooding, Drainage and Water Quality	Restricts development in areas at risk of flooding, protecting the capacity of the floodplain to store and convey water. It requires SUDS to be incorporated into all new development and makes provision for regional SUDS. New development must make connection to the public sewer. Includes a presumption against excessive engineering or culverting of watercourses.
Resources	
Resources for New Development	Provides guidance on a range of factors that can help to minimise resource use and waste, with the aim of increasing the sustainability of new development, including density, energy use, waste and water use efficiency.
Wind Turbine Development	Purpose is to clearly set out the information and requirements the Council will have to take into account when determining applications for wind energy developments. Also includes Onshore Wind Spatial Framework which describes the environmental and planning constraints for turbine development in Aberdeen City.
Energy Mapping	*Not yet produced*.

○ 2.4 Opportunity Sites

The ALDP allocates land for development in order to meet the requirements of the SDP. A list of the proposed sites is provided in Table 2.3 below. These must also be subject to assessment.

Table 2.3: Sites Allocated in the Proposed Local Development Plan

Sites Carried Forward		Policy
Bridge of Don and Grandhome		
OP1	Murcar	Land Release
OP2	Berryhill, Murcar	Business and Industrial Land/ Green Space Network
OP3	Findlay Farm, Murcar	Specialist Employment Area
OP4	Dubford Community Facilities	Residential/ Urban Green Space
OP5	Balgownie Centre, Bridge of Don	Residential
OP6	Balgownie Primary School	Residential
OP7	Aberdeen College Gordon Centre	Residential
OP8	East Woodcroft North	Residential
OP9	Grandhome	Land Release Policy/ Green Space Network
OP10	Dubford	Residential/ Green Space Network
OP11	Balgownie Home Farm	Mixed Use
OP12	Former 'One' Sports Centre (Barracudas)	Mixed Use
OP13	AECC Bridge of Don	Mixed Use
OP75	Denmore Road	Commercial Centre
Dyce, Bucksburn and Woodside		
OP14	Bankhead Academy	Residential
OP15	Former Carden School	Residential
OP16	Muggiemoss Mill	Mixed Use
OP17	Stoneywood	Residential/Green Space Network
OP18	Craibstone North and Walton Farm	Land Release Policy/ Green Space Network
OP19	Rowett North	Specialist Employment Area/ Green Space Network
OP20	Craibstone South	Land Release Policy/ Green Space Network
OP21	Rowett South	Land Release Policy/ Green Space Network
OP22	Greenferns Landward	Land Release Policy/
OP23	Dyce Drive	Business and Industrial Land/ Green Space Network
OP24	A96 Park and Ride	Land for Transport
OP25	Woodside	Residential/ GSN/ Green Belt
OP86	Dyce Railway Station	Land for Transport
Kingswells and Greenferns		
OP26	Auchmill Golf Course	Green Belt/ Green Space Network
OP27	Greenferns Infant School	Residential
OP28	Greenferns	Residential
OP29	Prime Four Business Park	Specialist Employment Area/ Green Space Network
OP63	Prime Four Business Park Phase 5 Extension	Specialist Employment
OP30	Kingswells D and West Huxterstone	Residential/ Green Space Network
OP31	Maidencraig South East	Residential/ Green Space Network
OP32	Maidencraig North East	Residential/ Green Space Network
OP33	Greenferns	Land Release/ GSN
OP34	East Arnhall	Land Release
OP63	Prime Four Extension	Specialist Employment
Countesswells		
OP38	Countesswells	Land Release Policy/ Green Space Network

Deeside		
OP39	Braeside Infant School	Residential
OP40	Cults Pumping Station	Residential
OP41	Friarsfield	Residential
OP42	Kennerty Mill	Residential
OP43	Milltimber Primary School	Residential
OP44	North Lasts Quarry	Green Belt
OP45	Peterculter East	Residential
OP46	Culter House Road	Residential
OP47	Edgehill Road	Residential/ Green Space Network
OP48	Oldfold	Land Release Policy
OP49	Grove Nursery Hazlehead	New Community Facilities
OP50	Skene Road Hazlehead	Green Belt/ Green Space Network
OP51	Peterculter Burn	Residential
OP52	Malcolm Road, Peterculter	Residential
OP108	Mid Anguston	Residential
OP109	Woodend, Peterculter	Residential
Loirston and Cove		
OP53	Aberdeen Gateway	Business and Industrial Land/ Green Belt/ Land Release
OP54	Altens East and Doonies	Business and Industrial Land
OP55	Blackhills Quarry	Green Belt
OP56	Cove	Residential
OP57	Craighill Primary School, Kincorth	Residential
OP58	Stationfields, Cove	Residential
OP59	Loirston	Land Release Policy/ Green Space Network
OP60	Charleston	Land Release Policy
OP61	Calder Park	Land Release Policy
OP62	Aberdeen Harbour Nigg Bay	Aberdeen Harbour/ Green Space Network
OP64	Ness Solar Farm	Green Belt/ Solar farm
OP103	Former Torry Nursery School	Residential
OP104	Craiginches Prison	Residential
OP105	Kincorth Academy	Residential
OP107	East Tullos Gas Holder	Business and Industrial
OP110	Wellington Circle	Business and Industrial
City Centre and Urban Areas		
OP35	Granitehill Road	Business and Industrial
OP36	Charlie House	New Community Facilities, respite centre
OP37	Burnside Centre	Business and Industrial Land
OP65	Haudagain Triangle, Middlefield	Residential/ Land for Transport
OP66	Manor Walk, Middlefield	Urban Green Space
OP67	Aberdeen Market	City Centre Retail Core
OP68	1 Western Road	Residential
OP69	140 Causewayend	Mixed Use
OP70	35 Froghall Road	Mixed Use
OP71	41 Nelson Street	Mixed Use
OP72	Aberdon House	Residential
OP73	Balgownie Machine Centre	Mixed Use
OP74	Broadford Works	Mixed Use
OP75	Denmore Road Retail	Commercial Centre
OP76	Causewayend Primary School	Mixed Use
OP77	Cornhill Hospital	Existing Community Sites and Facilities
OP78	Cotton Street	Business and Industrial Land
OP79	Crown House	Mixed Use
OP80	Bon Accord Masterplan Area	Mixed Use
OP81	Denburn and Woolmanhill	Mixed Use
OP82	Dunbar Halls of Residence	Residential

OP83	Energy Futures Centre South Beach	Urban Green Space, reserved for Energy Futures Centre
OP84	Hilton Nursery School	Residential
OP85	King Street/ Beach Esplanade	New Community Facilities
OP87	Pittodrie Park	Residential
OP88	Shore Porters Warehouse	Mixed Use
OP89	Smithfield Primary School	Residential
OP90	St Machar Primary School	Residential
OP91	Marischal Square	City Centre Retail Core, mixed use development
OP92	St Peter's Nursery, Spital	Mixed Use
OP93	Former Summerhill Academy	Residential
OP94	Tillydrone Primary School	Residential
OP95	Triple Kirks, Schoolhill	City Centre Retail Core, office development
OP96	Upper/Basement Floors 73/149 Union Street	City Centre Retail Core
OP97	Victoria Road Primary School	Mixed Use
OP98	VSA Gallowgate	Mixed Use
OP99	The Waterfront, Torry	Mixed Use
OP100	Water Lane	Mixed Use
OP101	Woodside Congregational Church	Residential
OP102	George Street/ Crooked Lane	City Centre Retail Core
OP106	Beach Esplanade (Jimmy Chungs)	Beach and Lesiure

- **3 Natura 2000 Sites**

Listed in Table 3.1 are the Natura 2000 sites with the potential to be significantly affected by future development in Aberdeen City. The criteria used for the selection of sites are: the effect on the aquatic environment, effect on mobile species, their vulnerability to recreational pressure, their potential to be affected by increased development and the effects on the coast.

Table 3.1: List of Natura 2000 sites

	European sites	Effect on aquatic environment	Effect on mobile species	Vulnerable to recreational pressure	Increase amount of development	Could affect the coast
1	River Dee SAC	√	√	√	√	√
2	Ythan Estuary, Sands of Forvie and Meikle loch SPA		√	√	√	√
3	Loch of Skene SPA		√		√	
4	Moray Firth SPA	√	√		√	
5	Berwickshire and North Northumberland Coast SAC: Grey seal	√	√		√	√
6	Isle of May SAC: Grey seal	√	√		√	√

- **3.1 Analysis of Natura 2000 sites**

In Table 3.2, these sites are analysed in terms of their conservation objectives, qualifying interests, the conditions of the sites, factors influencing the sites a their vulnerability to changes.

Table 3.2: Information about Sites Selected

Site & Conservation Objectives	Conservation Objectives	Qualifying Interest	Condition of Site	Factors influencing Site	Vulnerability to changes or potential effects of PPS
1. **River Dee** SAC (2446.82 ha) designated on 17/03/2005	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 for each of the qualifying features; and To ensure for the qualifying species that the following are maintained in the long term: • 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	Atlantic salmon (Salmo salar)	Favourable Maintained (10/09/2004)	Site is affected by housing developments, water abstraction and river engineering. The site is subject to recreational use	River Dee Integrated Catchment Management Plan is in place. There is guidance on best practice for river engineering works. **Summary of Key Issues** • Habitat loss • Disturbance • Potential Recreational impact • Coastal squeeze • Water abstraction
		Otter (Lutra lutra)	Favourable Maintained (30/09/2004)		
		Freshwater pearl mussel (Margaritifera margaritifera)	Unfavourable No change (07/08/2003)		

		pearl mussel host species • Structure, function and supporting processes of habitats supporting freshwater pearl mussel host species				
2.	**Ythan Estuary, Sands of Forvie and Meikle Loch** SPA (1016.24 ha) designated on 30/03/1998	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 To ensure for the qualifying species that the following are maintained in the long term: • Population of the species 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	Little tern (Sternula albifrons), breeding	Favourable Maintained (29/06/2008)	Factors that influence the site include tourism / leisure developments, Onshore Wind, Microrenewables, and Other developments	Burning will damage sensitive habitats and species. Tern colonies are vulnerable to damaging activities and disturbance. Tern breeding is vulnerable to predation and the periodic overtopping of the favoured shingle beds by sand. Shooting of geese is not an issue. Effects of eutrophication on the estuary and its flora and fauna. Invertebrates, which are the prey of waterfowl, are vulnerable to build up of algal mats. Fox control measures and bye laws are thought to be helping. **Summary of Key Issues** • Disturbance • Predation • recreational impacts • eutrophication
			Sandwich tern (Sterna sandvicensis), breeding	Favourable Maintained (31/07/2008)		
			Lapwing (Vanellus vanellus), non-breeding	Favourable Maintained (02/09/2007)		
			Eider (Somateria mollissima), non-breeding	Favourable Declining (21/08/2012)		
			Redshank (Tringa totanus), non-breeding	Favourable Maintained (31/01/2002)		
			Common tern (Sterna hirundo), breeding	Unfavourable No change (01/08/2012)		
			Pink-footed goose (Anser brachyrhynchus), non-breeding	Favourable Maintained (31/10/2002)		
			Waterfowl assemblage, non-breeding	Favourable Maintained (31/01/1999)		
3.	**Loch of Skene** SPA/RAMSAR (120.89 ha) designated on 01/10/1986	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 To ensure for the qualifying species that the following are maintained in the long term: • Population of the species as a viable component of the site	Greylag goose (Anser anser), non-breeding	Unfavourable Declining (01/11/2008)	The site has been subject of onshore wind and housing development applications. Loch subject to sailing activities, sports fishing and wildfowling.	SPA is vulnerable as hypertrophication - increase algal bloom which in turn affects aquatic flora and fauna and reduces food availability to the SPA interest. **Summary of Key Issues**

	• 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			Hypertrophication from sewerage and agriculture	• Hypertrophical & pollution • Potential disturbance from site activities
4. Moray Firth SAC (151347.17 ha) designated on 17/03/2005	To avoid deterioration of the qualifying habitat thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and To ensure for the qualifying habitat that the following are maintained in the long term: • Extent of the habitat on site • 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 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 for each of the qualifying features; and To ensure for the qualifying species that the following are established then maintained in the long term: • Population of the species 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	Subtidal sandbanks	Favourable Maintained (12/08/2004)	Dolphin Watching. Need to restore bottlenose dolphin population to a viable level.	The species are vulnerable to disturbance, harassment, contamination, reduction of food availability, traumatic death and injury. There is a recently introduced code of conduct for boats within the harbour. **Summary of Key Issues** • Disturbance • Harassment • Contamination • Injury • Potential poaching • Recreational impact
		Bottlenose dolphin (Tursiops truncatus)	Favourable Recovered (21/09/2010)		
5. Berwickshire and North Northumberland Coast SAC (65045.5	To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is	Grey seal	Favourable Maintained (10/11/2009)	Tourism / leisure developments developments, Offshore wind farm,	A mixture of cliffs, rocky shores and sandy bays attract a variety of recreational users for angling, diving,

ha) designated 17 March 2005	maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and To ensure for the qualifying species that the following are maintained in the long term: • Population of the species 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			maritime activities, telecommunications, transport infrastructure, harbour infrastructure railways, other utilities	watersports, etc. Difficulties arising from recreational activities are addressed by the site management scheme. The estuarine reef communities support an important crustacean fishery whilst offshore fisheries exist for *Nephrops* and some pelagic and demersal fish species. Wastewater discharges could have a localised effect on the site but will be subject to EC water quality legislation. **Key issues:** • Recreational Impact • Recreational Impact • Disturbance (to seals and their prey), • collision with shipping, • water quality, • habitat modification
6. Isle of May SAC (356.75 ha) designated on 17 March 2005	To avoid deterioration of the habitats of the qualifying species (listed below) 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 for each of the qualifying features; and To ensure for the qualifying species that the following are maintained in the long term: • Population of the species 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	Grey Seal (*Halichoerus grypus*)	Favourable Maintained (14/11/2009)	Tourism / leisure developments developments, Offshore wind farm, maritime activities, telecommunications, transport infrastructure, harbour infrastructure	The terrestrial part of the cSAC is a National Nature Reserve with a history of recreational pressure. However, the site is owned and managed by SNH, which ensures adequate protection for nature conservation. Visitor pressure to the island is concentrated outwith the seal-breeding season and is managed by a permit system for tourist boats. No landings are allowed during the seal-breeding season except by special permission and permit. At present, pressure from recreational divers is principally during the seals' non-breeding season. **Key issues** • Recreational Impact • Disturbance (to seals

					and their prey), • collision with shipping, • water quality, • habitat modification

- **4 Screening**

The purpose of screening is to determine whether any part of the ALDP, either individually or in combination with other plans or projects, is likely to have a significant effect on the Natura 2000 sites listed in Table 3.2 above. In doing so, those aspects of the plan which would be unlikely to have a significant effect are eliminated from further consideration.

- **4.1 Screening the Policies and Sites**

Aspects of the Plan are screened out on the basis of the following considerations:

- They are general policy statements;
- It is not possible to identify effects on any particular European site because proposals are too general;
- Projects are referred to in, but not proposed by, the ALDP;
- They are elements of the ALDP that are intended to protect the natural environment,
- They are elements of the ALDP which will not in themselves lead to development or other change;
- They are elements of the ALDP which make provision for change but which could have no conceivable effect because of the absence of a link or pathway between the plan and European sites;
- They are elements of the ALDP which make provision for change but effects are likely to minimal; and
- They are elements of a plan that could have no likely significant effect on a site, alone or in combination with other aspects of the same plan, or with other plans or projects

Table 4.1 comprises the first part of the screening process whereby proposed policies and sites are screened in or out of the assessment with reference to the above considerations.

Table 4.1: Screening of Policies & Opportunity Sites

Policies, objectives, actions and projects	PPS likely to have significant effects	General policy statements	Projects not generated by this PPS	Protective, enhancement and conservation policies	Does not generate development and change	Provision of change with no link or pathway to qualifying features	Provision of changed with no or minimal effects	Too general nature of PPS with no information on where, how, or when of implementation	Screen in / Screen out
POLICIES									
Spatial Strategy									
Vision Statement		X							Out
LR1 Land Release Policy	X								In
LR2 Delivery of Mixed Use Communities									Out
Network of Centres									
NC1 City Centre Development- Regional Centre							X		Out
NC2 Retail Core & Union Street							X		Out
NC3 West End Shops and Cafes							X		Out
NC4 Sequential Approach & Impact							X		Out
NC5 Out of Centre Proposals							X		Out
NC6 Town, District, Neighbourhood & Commercial Centres							X		Out
NC7 Local Shops Units				X					Out
NC8 Retail Development Serving New Development Areas								X	Out
NC9 Beach & Leisure		X						X	Out
Design									
D1 Quality Placemaking by Design				X					Out
D2 Landscape				X					Out
D3 Big Buildings				X					Out
D4 Historic Environment				X					Out
D5 Granite Heritage				X					Out
Infrastructure and Transport									
I1 Infrastructure & Developer Contributions		X						X	Out
T1 Land for Transport	X								In
T2 Managing the Transport Impact of Development		X							Out
T3 Sustainable and Active Travel		X						X	Out

T4 Air Quality				X					Out
T5 Noise				X					Out
Business and Industry									
B1 Business and Industrial Land					X			X	Out
B2 Specialist Employment Areas					X				Out
B3 West End Office Area							X		Out
B4 Aberdeen Airport				X					Out
B5 Aberdeen Harbour	X								In
B6 Pipelines, Major Hazards and Explosives Storage Sites				X					Out
Housing									
H1 Residential Areas				X					Out
H2 Mixed Use Areas				X					Out
H3 Density								X	Out
H4 Housing Mix								X	Out
H5 Affordable Housing								X	Out
H6 Gypsy and Traveller Caravan Sites							X		Out
H7 Gypsy and Traveller Requirements for New Residential Developments							X		Out
Community Facilities									
CF1 Existing Community Sites and Facilities							X	X	Out
CF2 New Community Facilities				X					Out
Natural Environment									
NE1 Green Space Network				X					Out
NE2 Green Belt				X					Out
NE3 Urban Green Space				X					Out
NE4 Open Space Provision in New Development				X					Out
NE5 Trees and Woodlands				X					Out
NE6 Flooding, Drainage and Water Quality				X					Out
NE7 Coastal Planning				X					Out
NE8 Natural Heritage				X					Out
NE9 Access and Informal Recreation				X					Out
Resources									
R1 Minerals		X						X	Out
R2 Degraded and Contaminated Land				X					Out
R3 New Waste Management Facilities								X	Out
R4 Sites for New Waste Management Facilities							X		Out

R5 Energy From Waste				X					Out
R6 Waste Management Requirements for New Development							X		Out
R7 Low and Zero Carbon Buildings and Water Efficiency				X					Out
R8 Renewable and Low Carbon Energy Developments								X	Out
Communications Infrastructure									
CI1 Digital Infrastructure		X							Out
CI2 Telecommunications Infrastructure		X							Out
SUPPLEMENTARY GUIDANCE									
Design – Landscape and Townscape									
Windows and Doors				X					Out
Shopfronts and Signs				X					Out
Big Buildings				X					Out
Stone Cleaning				X					Out
Temporary Buildings				X					Out
Landscape				X					Out
Energetica Design Guide				X					Out
Design – Modifications to Existing Buildings and Curtilages									
Householder Development Guide							X		Out
Curtilage Split and Redevelopment							X		Out
Conversions of Buildings in the Countryside								X	Out
City Centre Masterplan and Delivery Programme									
City Centre Masterplan and Delivery Programme									
Businesses									
Harmony of Uses							X		Out
Serviced Apartments							X		Out
Hierarchy of Centres							X		Out
Union Street Frontages							X		Out
Children's Nurseries							X		Out
Housing and Planning Obligations									
Developer Contributions		X							
Affordable Housing								X	Out
Gypsy/Traveller Sites							X		Out
Transport and Infrastructure									
Transport and Accessibility								X	Out
Air Quality				X					Out
Noise				X					Out

Natural Environment									
Natural Heritage				X					Out
Open Space				X					Out
Trees and Woodland				X					Out
Flooding and Drainage				X					Out
Resources									
Resources for New Development				X					Out
Wind Turbine Development								X	Out
Energy Mapping *Not yet produced*									
OPPORTUNITY SITES									
Bridge of Don and Grandhome									
OP1 Murcar	X								In
OP2 Berryhill, Murcar	X								In
OP3 Findlay Farm, Murcar	X								In
OP4 Dubford Community Facilities							X		Out
OP5 Balgownie Centre, Bridge of Don							X		Out
OP6 Balgownie Primary School							X		Out
OP7 Aberdeen College Gordon Centre							X		Out
OP8 East Woodcroft North						X			Out
OP9 Grandhome	X								In
OP10 Dubford	X								In
OP11 Balgownie Home Farm						X			Out
OP12 Former 'One' Sports Centre Barracudas						X			Out
OP13 AECC Bridge of Don						X			Out
OP75 Denmore Road	X								In
Dyce, Bucksburn and Woodside									
OP14 Bankhead Academy						X	X		Out
OP15 Former Carden School							X		Out
OP16 Muggiemoss Mill	X								In
OP17 Stoneywood	X								In
OP18 Craibstone North and Walton Farm	X								In
OP19 Rowett North	X								In
OP20 Craibstone South	X								In
OP21 Rowett South	X								In
OP22 Greenferns Landward	X								In
OP23 Dyce Drive						X			Out

OP24 A96 Park and Ride						X			Out
OP25 Woodside						X			Out
OP86 Dyce Railway Station						X			Out
Kingswells and Greenferns									
OP26 Auchmill Golf Course						X			Out
OP27 Greenferns Infant School						X			Out
OP28 Greenferns	X								In
OP29 Prime Four Business Park	X								In
OP63 Prime Four Business Park Phase 5 Extension	X					X			In
OP30 Kingswells D and West Huxterstone						X			Out
OP31 Maidencraig South East	X								In
OP32 Maidencraig North East	X								In
OP33 Greenferns	X								In
OP34 East Arnhall						X			Out
OP63 Prime Four Extension						X			Out
Countesswells									
OP38 Countesswells	X								In
Deeside									
OP39 Braeside Infant School							X		Out
OP40 Cults Pumping Station	X								In
OP41 Friarsfield	X								In
OP42 Kennerty Mill	X								In
OP43 Milltimber Primary School	X								In
OP44 North Lasts Quarry						X			Out
OP45 Peterculter East	X								In
OP46 Culter House Road	X								In
OP47Edgehill Road	X								In
OP48 Oldfold	X								In
OP49 Grove Nursery, Hazlehead						X			Out
OP50 Skene Road, Hazlehead						X			Out
OP51 Peterculter Burn	X								In
OP52 Malcolm Road	X								In
OP108 Mid Anguston	X								In
OP109 Woodend, Peterculter	X								In
Loirston and Cove									

OP53 Aberdeen Gateway	X								In
OP54 Altens East and Doonies	X								In
OP55 Blackhills Quarry	X								In
OP56 Cove	X								In
OP57 Craighill Primary School, Kincorth							X		Out
OP58 Stationfields, Cove	X								In
OP59 Loirston	X								In
OP60 Charleston							X		Out
OP61 Calder Park						X			Out
OP62 Aberdeen Harbour Nigg Bay	X								In
OP64 Ness Solar Farm	X								In
OP103 Former Torry Nursery School						X			Out
OP104 Craiginches Prison						X			Out
OP105 Kincorth Academy							X		Out
OP107 East Tullos Gas Holder						X			Out
OP110 Wellington Circle							X		Out
City Centre and Urban Areas									
OP35 Granitehill Road						X			Out
OP36 Charlie House						X			Out
OP37 Burnside Centre						X			Out
OP65 Haudagain Triangle, Middlefield						X			Out
OP66 Manor Walk, Middlefield						X			Out
OP67 Aberdeen Market						X			Out
OP68 1 Western Road						X			Out
OP69 140 Causewayend						X			Out
OP70 35 Froghall Road						X			Out
OP71 41 Nelson Street						X			Out
OP72 Aberdon House						X			Out
OP73 Balgownie Machine Centre						X			Out
OP74 Broadford Works	X								In
OP75 Denmore Road Retail						X			Out
OP76 Causewayend Primary School						X			Out
OP77 Cornhill Hospital						X			Out
OP78 Cotton Street						X			Out
OP79 Crown House						X			Out

OP80 Bon Accord Masterplan Area						X			Out
OP81 Denburn and Woolmanhill						X			Out
OP82 Dunbar Halls of Residence						X			Out
OP83 Energy Futures Centre South Beach	X								In
OP84 Hilton Nursery School						X			Out
OP85 King Street/ Beach Esplanade						X			Out
OP87 Pittodrie Park						X			Out
OP88 Shore Porters Warehouse						X			Out
OP89 Smithfield Primary School						X			Out
OP90 St Machar Primary School						X			Out
OP91 Marischal Square						X			Out
OP92 St Peter's Nursery Spital						X			Out
OP93 Former Summerhill Academy						X			Out
OP94 Tillydrone Primary School						X			Out
OP95 Triple Kirks Schoolhill						X			Out
OP96 Upper/Basement Floors 73/149 Union Street						X			Out
OP97 Victoria Road Primary School	X								In
OP98 VSA Gallowgate						X			Out
OP99 The Waterfront, Torry	X								In
OP100 Water Lane						X			Out
OP101 Woodside Congregational Church						X			Out
OP102 George Street/ Crooked Lane						X			Out
OP106 Beach Esplanade (Jimmy Chung's)	X								In

○ 4.2 Screening for LSE on Natura 2000 Sites

In the next stage of the HRA process, those policies and sites that have been screened in are subject to a second round of screening. This stage a considers in-combination effects, both with other elements of the ALDP (including aspects of the Plan screened out) and with other plans, projects a strategies already approved around the site in the wider area by Aberdeen City Council and other neighbouring local authorities. Taking this information i account, a conclusion is reached as to whether or not these policies and sites will have a Likely Significant Effect (LSE) on any Natura 2000 sites. Tho judged to have no LSE are then eliminated from the assessment, while those that are likely to have LSE will proceed to the next stage of the assessment.

4.3 Risk of LSE

Table 4.2 summarises the assessment undertaken to ascertain whether any of the screened in policies or sites will have a LSE on any Natura 2000 site, eitl individually or in combination with other sites and plans.

Table 4.2: Risk of LSE from Policies and Opportunity Sites

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
LR1 Land Release Policy	HL, RI, WA, EoP, D, WQ, EoN • Water abstraction to support additional development may create conditions of low water flow, damaging the habitats and species it hosts • 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	RI, EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	No impact	No impact	Projects listed in Appendices 1-3.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	• Development in low lying areas and flood plains may be affected by climate change • Disturbance to species (otter) and supporting habitats							
LR2 Delivery of Mixed Use Communities	HL, RI, WA, D, WQ • Water abstraction to support additional development • Increased 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	RI, EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	No impact	No impact	Projects listed in Appendices 1-3.	Yes
T1 Land for Transport	EoP, D, EoN • Water quality affected through soil and sediment deposition, waste disposal, and release of oil and fuel from infrastructural	RI, D, EoN • Any transport development in coastal areas has the potential to impact negatively on Bottlenose dolphins particularly noise impacts	No impact	No impact	No impact	No impact	Projects listed in Appendices 1-3.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	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 construction of the AWPR and improved rail services, in particular sections that cross the River Dee							
T2 Managing the Transport Impact of Development	HL, EoP, D, EoN • 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	No impact	No impact	No impact	No impact	No impact	Projects listed in Appendices 1-3.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	of the SAC, for improving or developing infrastructure; and through the modification of river channel • Disturbance from public transport access or vehicular access							
OP1 Murcar	No impact	EoP, D, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the coast enou to remove the likeliho of LSE.
OP2 Berryhill, Murcar	No impact	EoP, D, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the coast enou to remove the likeliho of LSE.
OP3 Findlay Farm, Murcar	No impact	EoP, D, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Potential negative impact	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the coast enou to remove the likeliho of LSE.

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
		on Bottlenose dolphins if noise is generated						
OP9 Grandhome	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP10 Dubford	WA • Water abstraction to support additional development	RI, EoP, D, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1-3.	Yes
OP75 Denmore Road	WA • Water abstraction to support additional development	RI, EoP, D, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Potential negative impact on Bottlenose dolphins if noise is generated.	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1-3.	No – the s is set back from the coast enou to remove the likelihc of LSE.
OP16 Muggiemoss Mill	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP17 Stoneywood	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP18 Craibstone North and Walton Farm	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
OP19 Rowett North	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP20 Craibstone South	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP21 Rowett South	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP22 Greenferns Landward	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP29 Prime 4 Business Park	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP31 Maidencraig South East	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP32 Maidencraig North East	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP33 Greenferns	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP38 Countesswells	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP40 Cults Pumping Station	RI, D, EoP, WQ • Water quality may be affected through run-	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	off from constructional works • Potential for future requirements for flood defences and subsequent impacts on floodplain • Disturbance to qualifying features from construction activity							
OP41 Friarsfield	RI, WA, D, EoP, WQ • Water abstraction to support additional development • Water quality may be affected through run-off from constructional works • Potential for future requirements for flood defences and subsequent impacts on floodplain • Disturbance to qualifying features from construction activity	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP42 Kennerty Mill	RI, D, EoP, WQ • Water quality may be affected through run-off from constructional works • Potential for future requirements for flood defences and subsequent impacts on floodplain • Disturbance to	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	qualifying features from construction activity							
OP43 Milltimber Primary School	RI, EoP, D, WQ • Water quality may be affected through run-off from constructional works • Potential for future requirements for flood defences and subsequent impacts on floodplain • Disturbance to qualifying features from construction activity.	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP45 Peterculter East	RI, EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works • Potential for future requirements for flood defences and subsequent impacts on floodplain • Disturbance to qualifying features from construction activity.	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP46 Culter House Road	RI, EoP, D, WQ • Water quality may be affected through run-off from constructional works • Potential for future requirements for flood defences and	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	subsequent impacts on floodplain • Disturbance to qualifying features from construction activity.							
OP47 Edgehill Road	RI, EoP, D, WQ • Water quality may be affected through run-off from constructional works • Potential for future requirements for flood defences and subsequent impacts on floodplain • Disturbance to qualifying features from construction activity	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP48 Oldfold	RI, WA, EoP, D, WQ • Water abstraction to support additional development • Water quality may be affected through run-off from constructional works • Potential for future requirements for flood defences and subsequent impacts on floodplain • Disturbance to qualifying features from construction activity	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP51 Peterculter Burn	EoP, D, WQ • Water abstraction to	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	support additional development • Water quality may be affected through run-off from constructional works • Potential for future requirements for flood defences and subsequent impacts on floodplain. • Adjacent to Peterculter Burn which forms part of the SAC.						1 and 2.	
OP52 Malcolm Road	RI, WA, EoP, D, WQ, EoN • Water abstraction to support additional development may create conditions of low water flow, damaging the habitats and species it hosts • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Disturbance to species (otter) and supporting habitats	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP108 Mid Anguston	RI, WA, EoP, D, WQ, EoN • Water abstraction to support additional development may create conditions of low water flow, damaging the habitats and species it hosts	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	• Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Disturbance to species (otter) and supporting habitats							
OP109 Woodend, Peterculter	RI, WA, EoP, D, WQ, EoN • Water abstraction to support additional development may create conditions of low water flow, damaging the habitats and species it hosts • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Disturbance to species (otter) and supporting habitats	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP53 Aberdeen Gateway	No impact	EoP, WQ • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the coast enou to remove the likeliho of LSE.
OP54 Altens East and Doonies	No impact	EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the coast enou to remove

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
		from land management and development • Development in low lying areas and flood plains may be affected by climate change • Potential negative impact on Bottlenose dolphins if noise is generated						the likelihc of LSE.
OP55 Blackhills Quarry	No impact	EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Development in low lying areas and flood plains may be affected by climate change • Potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the coast enou to remove the likelihc of LSE.
OP56 Cove	WA • Water abstraction to support additional development	RI, EoP, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices1 – 3.	Yes
OP58 Stationfields, Cove	No impact	RI, EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the coast enou to remove the likelihc of LSE.

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
		development. • Potential negative impact on Bottlenose dolphins if noise is generated.						
OP59 Loirston	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP62 Aberdeen Harbour Extension Nigg Bay	River Dee SAC for Atlantic salmon. Atlantic salmon are also sensitive to barriers to migration and reductions in water quality. Whilst freshwater pearl mussel will not occur in the development site, impacts to Atlantic salmon could have subsequent impacts on the mussels due to the role of the salmon in the mussels' lifecycle Moray Firth SAC - RI, CS, EoP, D, WQ, EoN Isle of May SAC - RI, D, Collision, WQ, Habitats Modification, Berwickshire & North Northumberland SAC - RI, D, Collision, WQ, Habitats Modification	RI, CS, EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	Physical damage (of habitats and species) – collision risk through increased vessel movement Non-physical disturbance – noise and vibration that may disturb the species Toxic contamination toxic effects on marine species from potential oil spillages etc. Non-toxic contamination – increases in suspended sediment and turbidity potentially affecting marine habitats and	Physical damage (of habitats and species) – collision risk through increased vessel movement Non-physical disturbance – noise and vibration that may disturb the species Toxic contamination toxic effects on marine species from potential oil spillages etc. Non-toxic contamination – increases in suspended sediment and turbidity potentially affecting marine habitats and species modification to	Policies and sites listed in Appendices 1 and 3.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
					species modification to the structures and processes of the habitats that the seals and their prey rely on (including impacts on water quality); effects of increased shipping activity arising from the harbour expansion causing disturbance to seals (and their prey) within and outwith the harbour area; and increased risk of propeller collision causing injury and mortality.	the structures and processes of the habitats that the seals and their prey rely on (including impacts on water quality); effects of increased shipping activity arising from the harbour expansion causing disturbance to seals (and their prey) within and outwith the harbour area; and increased risk of propeller collision causing injury and mortality.		
OP63 Prime Four Business Park Phase 5 Extension	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP64 Ness Solar Farm	No impact	EoP, D, WQ, EoN • Water quality may be affected through run-off	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
		from constructional works, diffuse and point pollution from land management and development • Potential negative impact on Bottlenose dolphins if noise is generated						coast enou to remove the likelihc of LSE.
OP74 Broadford Works	WA • Water abstraction to support additional development	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP83 Energy Futures Centre South Beach	No impact	EoP, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Development in low lying areas and flood plains may be affected by climate change • Potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the coast enou to remove the likelihc of LSE.
OP97 Victoria Road Primary School	EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Development in low lying areas and flood plains may be affected by climate change • Disturbance to species	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	(otter) and supporting habitats							
OP99 The Waterfront, Torry	EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Development in low lying areas and flood plains may be affected by climate change • Disturbance to species (otter) and supporting habitats	No impact	No impact	No impact	No impact	No impact	Plans and sites listed in Appendices 1 and 2.	Yes
OP106 Beach Esplanade (Jimmy Chung's)	No impact	EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Development in low lying areas and flood plains may be affected by climate change • Potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	No impact	No impact	Sites listed in Appendix 3.	No – the s is set back from the coast enou to remove the likelihc of LSE.
Policy B5 Aberdeen Harbour	River Dee SAC for Atlantic salmon. Atlantic salmon are also sensitive to barriers to migration and reductions in water quality. Whilst freshwater pearl mussel will not occur in the development site, impacts to Atlantic salmon could	RI, CS, EoP, D, WQ, EoN • Water quality may be affected through run-off from constructional works, diffuse and point pollution from land management and development • Potential negative impact on Bottlenose dolphins if noise is generated	No impact	No impact	Physical damage (of habitats and species) – collision risk through increased vessel movement	Physical damage (of habitats and species) – collision risk through increased vessel movement	Policies and sites listed in Appendices 1 and 3.	Yes

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
	have subsequent impacts on the mussels due to the role of the salmon in the mussels' lifecycle Moray Firth SAC - RI, CS, EoP, D, WQ, EoN Isle of May SAC - RI, D, Collision, WQ, Habitats Modification, Berwickshire & North Northumberland SAC - RI, D, Collision, WQ, Habitats Modification				Non-physical disturbance – noise and vibration that may disturb the species Toxic contamination toxic effects on marine species from potential oil spillages etc. Non-toxic contamination – increases in suspended sediment and turbidity potentially affecting marine habitats and species modification to the structures and processes of the habitats that the seals and their prey rely on (including impacts on water quality); effects of increased shipping activity	Non-physical disturbance – noise and vibration that may disturb the species Toxic contamination toxic effects on marine species from potential oil spillages etc. Non-toxic contamination – increases in suspended sediment and turbidity potentially affecting marine habitats and species modification to the structures and processes of the habitats that the seals and their prey rely on (including impacts on water quality); effects of increased shipping activity arising from the harbour expansion causing disturbance to		

Content of PP/Sites	River Dee SAC	Moray Firth SAC	Ythan Estuary, Sands of Forvie and Meikle Loch	Loch of Skene	Isle of May SAC:	Berwickshire and North Northumberland Coast SAC:	In-combination effects	Risk o LSE?
					arising from the harbour expansion causing disturbance to seals (and their prey) within and outwith the harbour area; and increased risk of propeller collision causing injury and mortality.	seals (and their prey) within and outwith the harbour area; and increased risk of propeller collision causing injury and mortality.		
Key			HL – Habitat Loss RI – Recreational Impact CC – Coastal Squeeze WA – Water Abstraction EoH – Effects on Hydrology EoP – Effects on Pollution D – Disturbance WQ – Water Quality EoN – Effect of Noise River Dee SAC (HL, D, RI, CS) Ythan Estuary, Sands of Forvie and Meikle Loch SPA (D, RI, EoP) Loch of Skene SPA/RAMSAR (EoP, D) Moray Firth SAC (D, EoP, RI, EoN)				

4.4 Summary of Screening and Mitigation Applied

The second screening exercise undertaken on the policies and opportunity sites recommended for inclusion in the ALDP has identified that there remains a risk of significant adverse effects 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, should these proposals proceed.

These risks largely relate to the scale of development proposed in the Plan and the effects that this will have on the River Dee SAC, in particular the need to abstract water from the River which may create conditions of low water flow, damaging the habitats and species that the river hosts. The cumulative effect of development in the vicinity of the River is also likely to put pressure on the SAC in terms of water quality, pollution and noise during construction which could lead to disturbance and habitat loss, as well as increasing the recreational impact once residential developments are occupied.

In terms of the Moray Firth SAC, although the ALDP proposes development in the vicinity of the coastline, in most cases this is set back far enough from the coasts so that the impact on the qualifying features of the SAC, particularly bottlenose dolphins, is not likely to be significant. The only proposal of any significance relating to the Moray Firth that still remains screened is the Aberdeen Harbor extension as this will involve development directly on the coast with no buffer.

It is Aberdeen City Council's obligation to either amend the plan or incorporate mitigation measures to ensure that the ALDP does not adversely affect the integrity of the SACs.

In mitigating the effects of the plan on the protected sites, a choice has been made from the following alternatives:

- Deleting the policy or proposal that may cause the likely significant effect;
- Changing the nature or type of potentially damaging proposals;
- Reducing the scale of the potentially damaging provision, whether it is an overall level of growth across all or part of the plan area, or a single proposal of a specific scale or size;
- Relocating or altering the spatial distribution of the potentially damaging provision;
- Phasing or timing of a proposal so that its possible effects can be adequately managed over time;
- Programming a proposal so that it is dependent on key infrastructure provision or upgrading, such as water supply or waste water treatment, being in place before it could proceed;
- Requiring buffer zones to be put in place; and
- Requiring lower-tier plans to undertake HRAs, SEAs or EIAs.

A summary of the policies and sites still judged as having a likely significant effect and the mitigation measures proposed is provided in Table 4.3 below:

Table 4.3: Initial Mitigation

Aspects of PP likely to have significant effects	Nature of likely significant effects	Mitigation measures	Any persisting risk of LSE?
LR1 Land Release Policy	River Dee SAC – HL, RI, WA, EoP, D, WQ, EoN Moray Firth SAC – RI, EoP, D, WQ, EoN	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
LR2 Delivery of Mixed Use Communities	River Dee SAC – HL, RI, WA, D, WQ Moray Firth SAC – RI, EoP, D, WQ, EoN	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
T1 Land for Transport	River Dee SAC – EoP, D, EoN Moray Firth SAC – RI, D, EoN	We cannot delete the policy, change its nature or reduce its scale, because it relates to long-standing projects that have been carried forward from the previously approved LDP and have already received commitment/permission from the Council and/or the Scottish Government. The following mitigation measures will therefore apply: • Buffer zones will be put in place; and • Individual schemes will require to undertake HRA/EIA to ensure that LSE are fully mitigated.	Yes
T2 Managing the Transport Impact of Development	River Dee SAC – HL, EoP, D, EoN	There is no need to delete the proposal, change its nature or reduce its scale as it merely lists a series of aspirational projects identified by the Strategic Transport Fund. In most cases, no specific information is provided on what form these projects will ultimately take. The following mitigation measures will apply to any schemes being taken forward: • Buffer zones will be put in place; and • Individual schemes will be required to undertake HRA/EIA to ensure that LSE are fully mitigated.	Yes
OP9 Grandhome	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP, and this allocation was made in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning	Yes

		permission is granted to ensure effects are fully mitigated.	
OP10 Dubford	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP16 Muggiemoss Mill	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP17 Stoneywood	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP18 Craibstone North and Walton Farm	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP19 Rowett North	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP20 Craibstone South	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012.	Yes

		The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own individual assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	
OP21 Rowett South	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP22 Greenferns Landward	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP28 Greenferns	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP29 Prime 4 Business Park	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP31 Maidencraig South East	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time;	Yes

		• Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	
OP32 Maidencraig North East	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own individual assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP33 Greenferns	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP38 Countesswells	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP40 Cults Pumping Station	River Dee SAC - RI, WA, D, EoP, WQ	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP41 Friarsfield	River Dee SAC - RI, WA, D, EoP, WQ	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and	Yes

		• Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	
OP42 Kennerty Mill	River Dee SAC - RI, WA, D, EoP, WQ	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP43 Milltimber Primary School	River Dee SAC - RI, WA, D, EoP, WQ	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP45 Peterculter East	River Dee SAC - RI, WA, EoP, D, WQ, EoN	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP46 Culter House Road	River Dee SAC - RI, WA, EoP, D, WQ	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP47 Edgehill Road	River Dee SAC - RI, WA, EoP, D, WQ	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes

OP48 Oldfold	River Dee SAC - RI, WA, EoP, D, WQ	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP ad this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP51 Peterculter Burn	River Dee SAC - EoP, D, WQ	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP52 Malcolm Road	River Dee SAC - RI, WA, EoP, D, WQ	We cannot delete the policy, change its nature or reduce the scale of land release due to the housing need identified for the Peterculter area and the need to support the local primary school. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP108 Mid Anguston	River Dee SAC - RI, WA, EoP, D, WQ	We cannot delete the policy, change its nature or reduce the scale of land release due to the housing need identified for the Peterculter area and the need to support the local primary school. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP109 Woodend, Peterculter	River Dee SAC - RI, WA, EoP, D, WQ	We cannot delete the policy, change its nature or reduce the scale of land release due to the housing need identified for the Peterculter area and the need to support the local primary school. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP56 Cove	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012.	Yes

		The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	
OP59 Loirston	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own individual assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP62 Aberdeen Harbour, Nigg Bay	River Dee SAC - RI, WA, EoP, D, WQ Moray Firth SAC - RI, CS, EoP, D, WQ, EoN Isle of May SAC - RI, D, Collision, WQ, Habitats Modification, Berwickshire & North Northumberland SAC - RI, D, Collision, WQ, Habitats Modification	• We cannot delete the policy, change its nature or reduce the scale of land release, as this is identified as a national development in the Scottish Government's National Planning Framework 3 (NPF3). • • The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated. • Impacts on these Isle of May SAC and Berwickshire & North Northumberland SAC should be considered in the HRA and EIA for the proposed development • HRA for the development should ensure that development avoids an adverse effect on the integrity of the SACs. • The Harbour Authority should take these effects into account when considering options for the harbour expansion.	Yes
OP63 Prime Four Business Park Phase 5 Extension	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release due to the exceptional demand for business land in the area. The following mitigation measures will therefore apply: • The site will be subject to a masterplanning exercise; • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP74 Broadford Works	River Dee SAC - WA	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply:	Yes

		• Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	
OP97 Victoria Road Primary School	River Dee SAC - EoP, D, WQ, EoN	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
OP99 The Waterfront, Torry	River Dee SAC - EoP, D, WQ, EoN	We cannot delete the policy, change its nature or reduce the scale of land release, as land allocations for housing and employment are dictated by the approved SDP and this site was allocated in the approved ALDP 2012. The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; • Buffer zones will be put in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated.	Yes
Policy B5 Aberdeen Harbour	River Dee SAC - RI, WA, EoP, D, WQ Moray Firth SAC - RI, CS, EoP, D, WQ, EoN Isle of May SAC - RI, D, Collision, WQ, Habitats Modification, Berwickshire & North Northumberland SAC - RI, D, Collision, WQ, Habitats Modification	We cannot delete the policy, change its nature or reduce the scale of land release, as this is identified as a national development in the Scottish Government's National Planning Framework 3 (NPF3). The following mitigation measures will therefore apply: • Development will be phased so that effects can be adequately managed over time; • Development will be programmed so that it does not proceed without the necessary infrastructure being in place; and • Any individual development proposals with LSE will be subject to their own assessments (HRA/EIA) before planning permission is granted to ensure effects are fully mitigated. • Impacts on these Isle of May SAC and Berwickshire & North Northumberland SAC should be considered in the HRA and EIA for the proposed development • HRA for the development should ensure that development avoids an adverse effect on the integrity of the SACs. • The Harbour Authority should take these effects into account when considering options for the harbour expansion.	Yes

- **5 Conclusion on Likely Significant Effects**

Following screening of the policies and development sites identified for inclusion in the proposed ALDP 2015 and the application of initial mitigation measures, we can conclude that those policies and opportunity sites still screened in have been judged to have the potential for remaining LSE on the Natura 2000 sites listed in this assessment. A further appropriate assessment must therefore be undertaken.

- **6 Appropriate Assessment**

Table 6.1 - Assessment of parts of plan with LSE

Aspects of PP having LSE	Sites/features affected/ Nature of effects	LSE individually and in combination (parts of plan and with external PP)	Mitigation measures	Risk of adverse effects on th integrity of sites?
LR1 Land Release Policy	River Dee SAC – HL, RI, WA, EoP, D, WQ, EoN Moray Firth SAC – RI, EoP, D, WQ, EoN	Internally, there is LSE in-combination with development policies such as Delivery of Mixed Use Communities, Land for Transport and Managing the Transport Impact of Development. External to the proposed plan, there is LSE in-combination with other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; Aberdeenshire Local Development Plan; Moray Development Plan; Aberdeen Local Transport Strategy; Aberdeen Core Paths Plan; Aberdeen Local Housing Strategy; Aberdeen Western Peripheral Route; Nestrans Regional Transport Strategy and Aberdeen Offshore Windfarm. LSE in-combination effects are due to increased demand for water abstraction to support additional development which may create conditions of low water flow; poor water quality through run-off from construction works, diffuse and point pollution from	A range of mitigation measures include prohibitions, case-specific explicit policy restrictions, case-specific policy caveats, contribution to the Council's mitigation strategy, management plans/construction method statements, lower-tiers assessments and additional policies. These are as follows: **Prohibitions** • **Policy NE1** refuses to permit developments likely to destroy or erode the character and/or function of the Green Space Network. • **Policy NE7** will prohibit development in areas at risk from coastal erosion and flooding (strong). In addition to the requirement for a Flood Risk Assessment (FRA), protection and promotion of public access to and along the coast will be protected and promoted wherever possible. • **Policy NE6** requires all development to be connected to the public sewers. Private wastewater treatment systems in sewered areas will not be permitted. **Case-specific explicit policy restrictions** • **Policy I1** is a case-specific explicit policy restriction requiring developers to provide infrastructure, services and facilities to support new development. • **Policy T4** is another a case-specific explicit policy restriction where development will not be permitted unless the impact on air quality is assessed and measures to mitigate the impact of air pollutants are proposed and can be agreed with the Planning Authority. **Contributing to the Council's mitigation strategy** • **Policy I1** requires developers to meet or make a contribution to the Council's	No

		land management and development; loss of habitat to housing developments; development in low lying areas and flood plains exacerbating the effects of climate change and disturbance to species (otter) and supporting habitats. For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.	mitigation strategy through meeting the cost of providing or improving such infrastructure or facilities. • **Preamble to Policy NE6** proposes a strategic-level Regional SuDS by Aberdeen City Council to provide sustainable flood risk management at a strategic scale to which developers will contribute. This will be detailed out in Supplementary Guidance on Transport and Infrastructure (Planning Obligations) and Natural Environment (Flooding, Drainage and Water Quality). **Case-specific policy caveats** • **Policy T2** is a case-specific policy caveat requiring developers to demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel. • **Policy NE6** requires developers to demonstrate that there will be no adverse effects on the environment, amenity and public health when providing a private sewerage system where there is no public sewerage system. • **Policy NE7** is also a case-specific policy caveat requiring developers to demonstrate through appropriate marine noise modelling that adverse impacts on Bottlenose Dolphins and Atlantic Salmon are avoided. **Management plans** • Developers will be required to submit a Construction Method Statement to include pollution prevention safeguards, drainage arrangements, sewerage treatment arrangements, how locations of outfalls are provided (detailing timing and method of installation), information on important habitats and species in the immediate vicinity, wildlife surveys, riverine buffer strip of approximately 10m from the river bank to the edge of the development ground to reduce disturbance to otters foraging along a riverbank, and information on the proximity of otter holts and resting if relevant. **Other Provisions** • **Policy T5** requires that, in cases where exposure to noise is likely to arise from development, a Noise Impact Assessment (NIA) will be required and submitted with the planning application by the applicant. • **Policy H2** requires applicants for development or change of use within Mixed Use Areas to take into account the existing uses and character of the surrounding area and avoid undue conflict with the adjacent land uses and amenity. • **Policy R7** requires a reduction in the pressure on water extraction from the River Dee and the pressure on water infrastructure, and for all new buildings to use water saving technologies and techniques. • **Policy R7** also requires developers of major infrastructure projects or other developments that will cross the Green Space Network to protect and enhance the coherence of the network.	

			Lower-tier Assessments - SEA/HRA/FRA/DIA • In addition to the requirement of SEA and HRA for lower tier plans and strategies, **Policy NE6** requires applications to provide a Flood Risk Assessment (FRA) and Drainage Impact Assessment (DIA) for areas liable to flooding and for developments of any size that affect sensitive areas. **Water Abstraction** • **Consistent with SDP we will** *avoid having to increase the amount of water Scottish Water are licensed to take from the River Dee, as a result of the new development proposed in the plan*". • We *support* our mitigation measure with the following explicit confirmation from Scottish Water thus*: "Taking into consideration all proposed developments in both the City and Shire Local Development Plan's, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. Therefore, we do not foresee the need to change the CAR Licence limit in response to growth anticipated in the North East.*	
LR2 Delivery of Mixed Use Communities	River Dee SAC – HL, RI, WA, D, WQ Moray Firth SAC – RI, EoP, D, WQ, EoN	Internally, there is LSE in-combination with development policies such as Land Release Policy, Land for Transport and Managing the Transport Impact of Development. External to the proposed plan, there is LSE in-combination with other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; Aberdeenshire Local Development Plan; Moray Development Plan; Aberdeen Local Transport Strategy; Aberdeen Core Paths Plan; Aberdeen Local Housing Strategy; Aberdeen Western Peripheral Route; Nestrans Regional Transport Strategy and Aberdeen Offshore Windfarm. LSE in-combination effects are due to increased demand for water abstraction to support additional development which may	As above.	No

		create conditions of low water flow; poor water quality through run-off from construction works, diffuse and point pollution from land management and development; loss of habitat to housing developments; development in low lying areas and flood plains exacerbating the effects of climate change and disturbance to species (otter) and supporting habitats. For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.		
T1 Land for Transport	River Dee SAC – EoP, D, EoN Moray Firth SAC – RI, D, EoN	Internally, there is LSE in-combination with development policies such as Land Release Policy, Delivery of Mixed Use Communities and Managing the Transport Impact of Development. External to the proposed plan, there is LSE in-combination with other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; Aberdeenshire Local Development Plan; Moray Development Plan; Aberdeen Local Transport Strategy; Aberdeen Core Paths Plan; Aberdeen Local Housing Strategy; Aberdeen Western Peripheral Route; Nestrans Regional Transport Strategy and Aberdeen Offshore Windfarm. LSE in-combination effects are due to increased demand for water abstraction to support additional development which may create conditions of low water flow; poor water quality through run-off from construction works, diffuse and point pollution from land management and development; loss of habitat to housing developments;	A range of mitigation measures include prohibitions, case-specific explicit policy restrictions, case-specific policy caveats, contribution to the Council's mitigation strategy, management plans/construction method statements, lower-tiers assessments and additional policies. These are as follows: **Prohibitions** • **Policy NE1** refuses to permit developments likely to destroy or erode the character and/or function of the Green Space Network. • **Policy NE7** will prohibit development in areas at risk from coastal erosion and flooding (strong). In addition to the requirement for a Flood Risk Assessment (FRA), protection and promotion of public access to and along the coast will be protected and promoted wherever possible. • **Policy NE6** requires all development to be connected to the public sewers. Private wastewater treatment systems in sewered areas will not be permitted. **Case-specific explicit policy restrictions** • **Policy I1** is a case-specific explicit policy restriction requiring developers to provide infrastructure, services and facilities to support new development. • **Policy T4** is another a case-specific explicit policy restriction where development will not be permitted unless the impact of the development on air quality is assessed and measures to mitigate the impact of air pollutants are proposed and can be agreed with the Planning Authority. **Contributing to the Council's mitigation strategy** • **Policy I1** requires developers to meet or make a contribution to the Council's mitigation strategy through meeting the cost of providing or improving such infrastructure or facilities.	No

		development in low lying areas and flood plains exacerbating the effects of climate change and disturbance to species (otter) and supporting habitats. For proposed developments in coastal locations there may be a potential negative impact on Bottlenose dolphins if noise is generated.	• **Preamble to Policy NE6** proposes a strategic-level Regional SuDS by Aberdeen City Council to provide sustainable flood risk management at a strategic scale to which developers will contribute. This will be detailed out in Supplementary Guidance on Transport and Infrastructure (Planning Obligations) and Natural Environment (Flooding, Drainage and Water Quality). **Case-specific policy caveats** • **Policy T2** is a case-specific policy caveat requiring developers to demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel. • **Policy NE7** is also a case-specific policy caveat requiring developers to demonstrate through appropriate marine noise modelling that adverse impacts on Bottlenose Dolphins and Atlantic Salmon are avoided. **Management plans** • Developers will be required to submit a Construction Method Statement to include pollution prevention safeguards, drainage arrangements, sewerage treatment arrangements, how locations of outfalls are provided (detailing timing and method of installation), information on important habitats and species in the immediate vicinity, wildlife surveys, riverine buffer strip of approximately 10m from the river bank to the edge of the development ground to reduce disturbance to otters foraging along a riverbank, and information on the proximity of otter holts and resting if relevant **Other Provisions** • **Policy T5** requires that, in cases where exposure to noise is likely to arise from development, a Noise Impact Assessment (NIA) will be required and submitted with the planning application by the applicant. • **Policy H2** requires applicants for development or change of use within Mixed Use Areas to take into account the existing uses and character of the surrounding area and avoid undue conflict with the adjacent land uses and amenity. • **Policy R7** requires developers of major infrastructure projects or other developments that will cross the Green Space Network to protect and enhance the coherence of the network. **Lower-tier Assessments - SEA/HRA/FRA/DIA** • In addition to the requirement of SEA and HRA for lower tier plans and strategies, **Policy NE6** requires applications to provide a Flood Risk Assessment (FRA) and Drainage Impact Assessment (DIA) for areas liable to flooding and for developments of any size that affect sensitive areas.	

T2 Managing the Transport Impact of Development	River Dee SAC – HL, EoP, D, EoN	Internally, there is LSE in-combination with development policies such as Land Release, Delivery of Mixed Use Communities and Land for Transport. External to the proposed plan, there is LSE in-combination with other plans like Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; Aberdeenshire Local Development Plan; Aberdeen City Local Transport Strategy; Aberdeen Core Paths Plan; Aberdeen Local Housing Strategy; Aberdeen Western Peripheral Route; and Nestrans Regional Transport Strategy. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change and disturbance to species (otter) and supporting habitats.	A range of mitigation measures include prohibitions, case-specific explicit policy restrictions, case-specific policy caveats, contribution to the Council's mitigation strategy, management plans/construction method statements, lower-tiers assessments and additional policies. These are as follows: **Prohibitions** • **Policy NE1** refuses to permit developments likely to destroy or erode the character and/or function of the Green Space Network. • **Policy NE6** requires all development to be connected to the public sewers. Private wastewater treatment systems in sewered areas will not be permitted. **Case-specific explicit policy restrictions** • **Policy I1** is a case-specific explicit policy restriction requiring developers to provide infrastructure, services and facilities to support new development. • **Policy T4** is another a case-specific explicit policy restriction where development will not be permitted unless the impact of the development on air quality is assessed and measures to mitigate the impact of air pollutants are proposed and can be agreed with the Planning Authority. **Contributing to the Council's mitigation strategy** • **Policy I1** requires developers to meet or make a contribution to the Council's mitigation strategy through meeting the cost of providing or improving such infrastructure or facilities. • **Preamble to Policy NE6** proposes a strategic-level Regional SuDS by Aberdeen City Council to provide sustainable flood risk management at a strategic scale to which developers will contribute. This will be detailed out in Supplementary Guidance on Transport and Infrastructure (Planning Obligations) and Natural Environment (Flooding, Drainage and Water Quality). **Case-specific policy caveats** • **Policy NE6** requires developers to demonstrate that there will be no adverse effects on the environment, amenity and public health when providing a private sewerage system where there is no public sewerage system. • **Policy NE7** is also a case-specific policy caveat requiring developers to demonstrate through appropriate marine noise modelling that adverse impacts on Bottlenose Dolphins and Atlantic Salmon are avoided. **Management plans** • Developers will be required to submit a Construction Method Statement to include pollution prevention safeguards, drainage arrangements, sewerage treatment arrangements, how locations of outfalls are provided (detailing timing and method	No

			of installation), information on important habitats and species in the immediate vicinity, wildlife surveys, riverine buffer strip of approximately 10m from the river bank to the edge of the development ground to reduce disturbance to otters foraging along a riverbank, and information on the proximity of otter holts and resting if relevant **Other Provisions** • **Policy T5** requires that, in cases where exposure to noise is likely to arise from development, a Noise Impact Assessment (NIA) will be required and submitted with the planning application by the applicant. • **Policy H2** requires applicants for development or change of use within Mixed Use Areas to take into account the existing uses and character of the surrounding area and avoid undue conflict with the adjacent land uses and amenity. • **Policy R7** requires developers of major infrastructure projects or other developments that will cross the Green Space Network to protect and enhance the coherence of the network. **Lower-tier Assessments - SEA/HRA/FRA/DIA** • In addition to the requirement of SEA and HRA for lower tier plans and strategies, **Policy NE6** requires applications to provide a Flood Risk Assessment (FRA) and Drainage Impact Assessment (DIA) for areas liable to flooding and for developments of any size that affect sensitive areas.	
OP9 Grandhome	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP10, OP16, OP17, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	This will be mitigated by the following policies: • **Policy R7** requires a reduction in the pressure on water extraction from the River Dee and the pressure on water infrastructure, and for all new buildings to use water saving technologies and techniques; and • In addition to the requirement of SEA and HRA for lower tier plans and strategies, **Policy NE6** requires applications to provide a Flood Risk Assessment (FRA) and Drainage Impact Assessment (DIA) for areas liable to flooding and for developments of any size that affect sensitive areas. Water Abstraction • **Consistent with SDP we will** *avoid having to increase the amount of water Scottish Water are licensed to take from the River Dee, as a result of the new development proposed in the plan*". • *We* support our mitigation measure with the following explicit confirmation from Scottish Water thus*:* ***"****Taking into consideration all proposed developments in both the City and Shire Local Development Plan's, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. Therefore, we do not foresee the need to change the CAR Licence limit in response to growth anticipated in the North East.*	No

OP10 Dubford	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP16, OP17, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP16 Muggiemoss Mill	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP17, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP17 Stoneywood	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan,	As above.	No

		there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.		
OP18 Craibstone North and Walton Farm	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP19 Rowett North	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP20 Craibstone South	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a	As above.	No

		significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP19, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.		
OP21 Rowett South	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP19, OP20, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP22 Greenferns Landward	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP19, OP20, OP21, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the	As above.	No

		Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.		
OP29 Prime 4 Business Park	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP19, OP20, OP21, OP22, OP28, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP31 Maidencraig South East	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP32 Maidencraig North East	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17,		

		OP10, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP33, OP38, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.		
OP33 Greenferns	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP10, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP38 OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP38 Countesswells	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP41, OP44, OP48, OP56, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012;	As above.	No

		and the Aberdeenshire Local Development Plan.		
OP56 Cove	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP59, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP59 Loirston	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP63 and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP63 Prime Four Business Park Phase 5 Extension	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, , OP18, OP19, OP20, OP21, OP22, OP28, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59	As above.	No

		and OP74). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.		
OP74 Broadford Works	River Dee SAC - WA	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP10, OP16, OP17, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP38, OP41, OP44, OP48, OP56, OP59 and OP63). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	No
OP41 Friarsfield	River Dee SAC - RI, WA, D, EoP, WQ	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP16, OP17, OP10, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP44, OP48, OP56, OP63, and OP74) and with other developments not listed here which are in close proximity to the River Dee (OP40, OP42, OP43, OP45, OP46, OP47, OP51, OP97 and OP99). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic	A range of mitigation measures include prohibitions, case-specific explicit policy restrictions, case-specific policy caveats, contribution to the Council's mitigation strategy, management plans/construction method statements, lower-tiers assessments and additional policies. These are as follows: **Prohibitions** • **Policy NE1** refuses to permit developments likely to destroy or erode the character and/or function of the Green Space Network. • **Policy NE6** requires all development to be connected to the public sewers. Private wastewater treatment systems in sewered areas will not be permitted. **Case-specific explicit policy restrictions** • **Policy I1** is a case-specific explicit policy restriction requiring developers to provide infrastructure, services and facilities to support new development. • **Policy T4** is another a case-specific explicit policy restriction where development will not be permitted unless the impact of the development on air quality is	No

		Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are an increase in the need for water abstraction to service new development; poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.	assessed and measures to mitigate the impact of air pollutants are proposed and can be agreed with the Planning Authority. **Contributing to the Council's mitigation strategy** • **Policy I1** requires developers to meet or make a contribution to the Council's mitigation strategy through meeting the cost of providing or improving such infrastructure or facilities. • **Preamble to Policy NE6** proposes a strategic-level Regional SuDS by Aberdeen City Council to provide sustainable flood risk management at a strategic scale to which developers will contribute. This will be detailed in Supplementary Guidance on Transport and Infrastructure (Planning Obligations) and Natural Environment (Flooding, Drainage and Water Quality). **Case-specific policy caveats** • **Policy NE6** requires developers to demonstrate that there will be no adverse effects on the environment, amenity and public health when providing a private sewerage system where there is no public sewerage system. • **Policy NE7** is also a case-specific policy caveat requiring developers to demonstrate through appropriate marine noise modelling that adverse impacts on Bottlenose Dolphins and Atlantic Salmon are avoided. **Management plans** • Developers will be required to submit a Construction Method Statement to include pollution prevention safeguards, drainage arrangements, sewerage treatment arrangements, how locations of outfalls are provided (detailing timing and method of installation), information on important habitats and species in the immediate vicinity, wildlife surveys, riverine buffer strip of approximately 10m from the river bank to the edge of the development ground to reduce disturbance to otters foraging along a riverbank and information on the proximity of otter holts and resting if relevant **Other Provisions** • **Policy T5** requires that, in cases where exposure to noise is likely to arise from development, a Noise Impact Assessment (NIA) will be required and submitted with the planning application by the applicant. • **Policy R7** requires a reduction in the pressure on water extraction from the River Dee and the pressure on water infrastructure, and for all new buildings to use water saving technologies and techniques. • **Policy R7** also requires developers of major infrastructure projects or other developments that will cross the Green Space Network to protect and enhance the coherence of the network. **Lower-tier Assessments - SEA/HRA/FRA/DIA**	

			• In addition to the requirement of SEA and HRA for lower tier plans and strategies, **Policy NE6** requires applications to provide a Flood Risk Assessment (FRA) and Drainage Impact Assessment (DIA) for areas liable to flooding and for developments of any size that affect sensitive areas. **Water Abstraction** • **Consistent with SDP HRA we will** *avoid having to increase the amount of water Scottish Water are licensed to take from the River Dee, as a result of the new development proposed in the plan*". We **support** our mitigation measure with the following explicit confirmation from Scottish Water thus*:* ***"****Taking into consideration all proposed developments in both the City and Shire Local Development Plan's, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. Therefore, we do not foresee the need to change the CAR Licence limit in response to growth anticipated in the North East.*	
OP48 Oldfold	River Dee SAC - RI, WA, EoP, D, WQ	Internally, there is LSE in-combination with other development proposals of a significant size which will require water abstraction from the River Dee (OP9, OP16, OP17, OP10, OP18, OP19, OP20, OP21, OP22, OP28, OP29, OP31, OP32, OP33, OP41, OP44, OP56, OP63 and OP74) and with other developments not listed here which are in close proximity to the River Dee (OP40, OP42, OP43, OP45, OP46, OP47, OP51, OP97 and OP99). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are an increase in the need for water abstraction to service new development; poor water quality through run-off from construction	As above.	No

		works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.		
OP40 Cults Pumping Station	River Dee SAC - RI, D, EoP, WQ	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP41, OP42, OP43, OP45, OP46, OP47, OP48, OP51, OP52, OP97 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.	A range of mitigation measures include prohibitions, case-specific explicit policy restrictions, case-specific policy caveats, contribution to the Council's mitigation strategy, management plans/construction method statements, lower-tiers assessments and additional policies. These are as follows: **Prohibitions** • **Policy NE1** refuses to permit developments likely to destroy or erode the character and/or function of the Green Space Network. • **Policy NE6** requires all development to be connected to the public sewers. Private wastewater treatment systems in sewered areas will not be permitted. **Case-specific explicit policy restrictions** • **Policy I1** is a case-specific explicit policy restriction requiring developers to provide infrastructure, services and facilities to support new development. • **Policy T4** is another a case-specific explicit policy restriction where development will not be permitted unless the impact of the development on air quality is assessed and measures to mitigate the impact of air pollutants are proposed and can be agreed with the Planning Authority. **Contributing to the Council's mitigation strategy** • **Policy I1** requires developers to meet or make a contribution to the Council's mitigation strategy through meeting the cost of providing or improving such infrastructure or facilities. • **Preamble to Policy NE6** proposes a strategic-level Regional SuDS by Aberdeen City Council to provide sustainable flood risk management at a strategic scale to which developers will contribute. This will be detailed in Supplementary Guidance on Transport and Infrastructure (Planning Obligations) and Natural Environment (Flooding, Drainage and Water Quality). **Case-specific policy caveats** • **Policy NE6** requires developers to demonstrate that there will be no adverse effects on the environment, amenity and public health when providing a private sewerage system where there is no public sewerage system. • **Policy NE7** is also a case-specific policy caveat requiring developers to	No

			demonstrate through appropriate marine noise modelling that adverse impacts on Bottlenose Dolphins and Atlantic Salmon are avoided. **Management plans** • Developers will be required to submit a Construction Method Statement to include pollution prevention safeguards, drainage arrangements, sewerage treatment arrangements, how locations of outfalls are provided (detailing timing and method of installation), information on important habitats and species in the immediate vicinity, wildlife surveys, riverine buffer strip of approximately 10m from the river bank to the edge of the development ground to reduce disturbance to otters foraging along a riverbank and information on the proximity of otter holts and resting if relevant **Other Provisions** • **Policy T5** requires that, in cases where exposure to noise is likely to arise from development, a Noise Impact Assessment (NIA) will be required and submitted with the planning application by the applicant. • **Policy R7** also requires developers of major infrastructure projects or other developments that will cross the Green Space Network to protect and enhance the coherence of the network. **Lower-tier Assessments - SEA/HRA/FRA/DIA** • In addition to the requirement of SEA and HRA for lower tier plans and strategies, **Policy NE6** requires applications to provide a Flood Risk Assessment (FRA) and Drainage Impact Assessment (DIA) for areas liable to flooding and for developments of any size that affect sensitive areas. **Water Abstraction** • **Consistent with SDP HRA we will** *avoid having to increase the amount of water Scottish Water are licensed to take from the River Dee, as a result of the new development proposed in the plan*". • We support our mitigation measure with the following explicit confirmation from Scottish Water thus*: "Taking into consideration all proposed developments in both the City and Shire Local Development Plan's, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. Therefore, we do not foresee the need to change the CAR Licence limit in response to growth anticipated in the North East.*	
OP42 Kennerty Mill	River Dee SAC - RI, D, EoP, WQ	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP40, OP41, OP43, OP45, OP46, OP47,	As above.	No

		OP48, OP51, OP52, OP97 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.		
OP45 Peterculter East	River Dee SAC - RI, EoP, D, WQ, EoN	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP40, OP41, OP42, OP43, OP46, OP47, OP48, OP51, OP52, OP97 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.	As above.	No
OP46 Culter House Road	River Dee SAC - RI, EoP, D, WQ	Internally, there is LSE in-combination with other	As above.	No

		development proposals in close proximity to the River Dee (OP40, OP41, OP42, OP43, OP45, OP47, OP48, OP51, OP52, OP97 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.		
OP47 Edgehill Road	River Dee SAC - RI, EoP, D, WQ	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP40, OP41, OP42, OP43, OP45, OP46, OP48, OP51, OP52, OP97 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and	As above.	No

		supporting habitats.		
OP51 Peterculter Burn	River Dee SAC - EoP, D, WQ	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP40, OP41, OP42, OP43, OP45, OP46, OP47, OP48, OP51, OP52, OP97 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.	As above.	No
OP52 Malcolm Road	River Dee SAC - RI, EoP, D, WQ	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP40, OP41, OP42, OP43, OP45, OP46, OP47, OP48, OP51, OP97 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas	As above.	No

		and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.		
OP108 Mid Anguston	River Dee SAC - RI, EoP, D, WQ	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP40, OP41, OP42, OP43, OP45, OP46, OP47, OP48, OP51, OP97 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.	As above.	No
OP109 Woodend, Peterculter	River Dee SAC - RI, EoP, D, WQ	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP40, OP41, OP42, OP43, OP45, OP46, OP47, OP48, OP51, OP97 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse	As above.	No

		and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.		
OP97 Victoria Road Primary School	River Dee SAC - RI, EoP, D, WQ	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP40, OP41, OP42, OP43, OP45, OP46, OP47, OP48, OP51, OP52 and OP99. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.	As above.	No
OP99 The Waterfront, Torry	River Dee SAC - EoP, D, WQ, EoN	Internally, there is LSE in-combination with other development proposals in close proximity to the River Dee (OP40, OP41, OP42, OP43, OP45, OP46, OP47, OP48, OP51, OP52 and OP97. External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; and the Aberdeenshire Local Development Plan.	As above.	

		LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species (otter) and supporting habitats.		
OP62 Aberdeen Harbour, Nigg Bay	Moray Firth SAC - RI, CS, EoP, D, WQ, EoN	Internally, there is LSE in-combination with other development proposals in close proximity to the coast (OP1, OP2, OP3, OP7, OP53, OP54, OP55, OP56, OP58 OP78, OP83, OP85, OP88 and OP99.). External to the proposed plan, there is LSE in-combination with development allocations identified in other plans such as the Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; the Aberdeenshire Local Development Plan and the Moray Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change, and disturbance to species and supporting habitats. There may also be a potential negative impact on Bottlenose dolphins if noise is generated.	A range of mitigation measures include prohibitions, case-specific explicit policy restrictions, case-specific policy caveats, contribution to the Council's mitigation strategy, management plans/construction method statements, lower-tiers assessments and additional policies. These are spelt out as follows: **Prohibitions** • **Policy NE1** refuses to permit developments likely to destroy or erode the character and/or function of the Green Space Network. • **Policy NE7** will prohibit development in areas at risk from coastal erosion and flooding (strong). In addition to the requirement for a Flood Risk Assessment (FRA), protection and promotion of public access to and along the coast will be protected and promoted wherever possible. • **Policy NE6** requires all development to be connected to the public sewers. Private wastewater treatment systems in sewered areas will not be permitted. **Case-specific explicit policy restrictions** • **Policy I1** is a case-specific explicit policy restriction requiring developers to provide infrastructure, services and facilities to support new development. • **Policy T4** is another a case-specific explicit policy restriction where development will not be permitted unless the impact of the development on air quality is assessed and measures to mitigate the impact of air pollutants are proposed and can be agreed with the Planning Authority. **Contributing to the Council's mitigation strategy** • **Policy I1** requires developers to meet or make a contribution to the Council's mitigation strategy through meeting the cost of providing or improving such infrastructure or facilities. • **Preamble to Policy NE6** proposes a strategic-level Regional SuDS by Aberdeen City Council to provide sustainable flood risk management at a strategic scale to which developers will contribute. This will be detailed out in Supplementary Guidance on Transport and Infrastructure (Planning Obligations) and Natural Environment (Flooding, Drainage and Water Quality).	No

			Case-specific policy caveats • **Policy NE6** requires developers to demonstrate that there will be no adverse effects on the environment, amenity and public health when providing a private sewerage system where there is no public sewerage system. • **Policy NE7** is also a case-specific policy caveat requiring developers to demonstrate through appropriate marine noise modelling that adverse impacts on Bottlenose Dolphins and Atlantic Salmon are avoided. **Management plans** • Developers will be required to submit a Construction Method Statement to include pollution prevention safeguards, drainage arrangements, sewerage treatment arrangements, how locations of outfalls are provided (detailing timing and method of installation), information on important habitats and species in the immediate vicinity, wildlife surveys, riverine buffer strip of approximately 10m from the river bank to the edge of the development ground to reduce disturbance to otters foraging along a riverbank and information on the proximity of otter holts and resting if relevant. **Other Provisions** • **Policy T5** requires that, in cases where exposure to noise is likely to arise from development, a Noise Impact Assessment (NIA) will be required and submitted with the planning application by the applicant. • **Policy R7** requires developers of major infrastructure projects or other developments that will cross the Green Space Network to protect and enhance the coherence of the network. **Lower-tier Assessments - SEA/HRA/FRA/DIA** • In addition to the requirement of SEA and HRA for lower tier plans and strategies, **Policy NE6** requires applications to provide a Flood Risk Assessment (FRA) and Drainage Impact Assessment (DIA) for areas liable to flooding and for developments of any size that affect sensitive areas. Water Abstraction • **Consistent with SDP we will** *avoid having to increase the amount of water Scottish Water are licensed to take from the River Dee, as a result of the new development proposed in the plan*". We **support** our mitigation measure with the following explicit confirmation from Scottish Water thus*: **"**Taking into consideration all proposed developments in both the City and Shire Local Development Plan's, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract.*	

			Therefore, we do not foresee the need to change the CAR Licence limit in response to growth anticipated in the North East.	
Policy B5 Aberdeen Harbour	River Dee SAC - RI, WA, EoP, D, WQ Moray Firth SAC - RI, CS, EoP, D, WQ, EoN Isle of May SAC - RI, D, Collision, WQ, Habitats Modification, Berwickshire & North Northumberland SAC - RI, D, Collision, WQ, Habitats Modification	Internally, there is LSE in-combination with development policies such as Land Release, Delivery of Mixed Use Communities and land for Transport and with other Opportunity Sites affecting the coast. External to the proposed plan, there is LSE in-combination with other plans like Aberdeen City and Shire Strategic Development Plan; Aberdeen Local Development Plan 2012; Aberdeenshire Local Development Plan and Moray Development Plan. LSE in-combination effects are poor water quality through run-off from construction works, diffuse and point pollution from land management and development; development in low lying areas and flood plains exacerbating the effects of climate change and disturbance to species and supporting habitats. There may also be a potential negative impact on Bottlenose dolphins if noise is generated. On Isle of May SAC and Berwickshire & North Northumberland SAC, the main effects include: • Recreational Impact • Recreational Impact • Disturbance (to seals and their prey), • collision with shipping, • water quality, habitat modification	**Dredging** Project HRA will need to demonstrate that there are no adverse effects on the integrity of European sites from projects either alone or in-combination with other plans or projects. Potential mitigation available at this point includes: • Avoid construction on sensitive habitat (e.g. SPA bird roosting sites) through project planning and design. • Use project level planning and design to ascertain whether dredging will result in local changes to erosion / deposition patterns. Design mitigation accordingly. • Undertake dredging work at times of the year appropriate for the species in question i.e. avoiding bird overwintering and breeding periods, the most intense periods of fish migration, seal breeding season (September-late November for grey seals). Consult with SNH on most appropriate times. • Adhere to careful dredging practice and use a precautionary approach to avoid or reduce impacts. Timing of dredging and disposal operations, selection of Best Available Technique (BAT) dredging methods. • Requirement for mitigation measures is subject to further detailed assessment at project level (e.g. numerical modelling) • Sensitive areas (e.g. intertidal mudflat) subject to potential erosion could be recharged with sediment (e.g. by overspilling during dredging). • Use dredging techniques most appropriate to the seabed type to avoid excessive sediment mobilisation and adverse impacts on interest features (e.g. minimising overspill). **Piling** Avoid construction on or close to sensitive habitat (e.g. SPA bird roosting sites) through project planning and design. If avoidance is not possible, provide mitigation habitat elsewhere. • Use project planning and design to ascertain whether proposed piling and introduced structures will result in local changes to erosion/deposition patterns. Design mitigation accordingly. • Undertake construction work at times of the year appropriate for the species in question i.e. avoiding bird overwintering and breeding periods, most intense periods of fish migration, seal breeding season (September-late November for grey seals). Consult with SNH on most appropriate times. • Use less intrusive piling methods (e.g. passive gas and soft start) and noise screens (e.g. bubble curtains) during sensitive periods i.e. during fish migration and seal breeding season • Adhere to careful practice and use a precautionary approach to avoid or reduce impacts. Selection of Best Available Technique (BAT) methods. **Land Use Change** Avoid construction on sensitive habitat (e.g. SPA bird roosting sites) through project planning and design. • Use project planning and design to ascertain whether development will result in local changes to erosion/deposition patterns. Design mitigation accordingly.	

			• Undertake construction work at times of the year appropriate for the species in question i.e. avoiding bird overwintering and breeding periods, most intense periods of fish migration, seal breeding season (June and July for harbour seals; September-late November for grey seals). Consult with SNH on most appropriate times. • Mitigation and monitoring measures applied to the source of impact will mitigate this impact (e.g. implementing measures to avoid adverse effects on prey species will avoid effects on marine mammals / birds) • **Increased levels of vessels** Time construction activities to reduce noise impacts and physical dangers posed by increased vessel traffic. • General good housekeeping measures to avoid spillages and implementation of contingency plans should spills occur. • Time construction activity to avoid the most intense periods of fish migration **Building construction / demolition (including site clearance, land remediation)** Avoid construction on sensitive offsite habitat (e.g. SPA bird roosting sites) through project planning and design. • Use project planning and design to ascertain whether development will result in local changes to erosion/deposition patterns. Design mitigation accordingly. • Undertake construction work at times of the year appropriate for the species in question i.e. avoiding bird overwintering and breeding periods, most intense periods of fish migration, seal breeding season (September-late November for grey seals). Consult with SNH on most appropriate times. • Mitigation and monitoring measures applied to the source of impact will mitigate this impact (e.g. implementing measures to avoid adverse effects on prey species will avoid effects on marine mammals / birds). • Planning and design measures required to minimise	

7 Conclusions

We have carried out appropriate assessment of aspects of the Proposed Aberdeen Local Development Plan 2015 which we have screened to have LSE effects on Natura 2000 sites either alone or in combination with other aspects of the plan or with other plans or projects. Mitigation measures we have applied include:

- Case-specific explicit policy restrictions;
- Case-specific policy caveats;
- HRA/SEA/DIA/FRA for lower-tier plans and projects;
- Contractors method statements;
- Contribution to Aberdeen City Council's mitigation strategy; and
- Other protective policies

In light of the assessment carried out, mitigation measures applied and the explicit confirmation letter for Scottish Water that *"taking into consideration all proposed developments in both the City and Shire Local Development Plan's, the amount of water required from the River Dee is forecast to still fall below the current volume that Scottish Water is licensed to abstract. Therefore, we do not foresee the need to change the CAR Licence limit in response to growth anticipated in the North East,"* we can ascertain that the plan will not adversely affect the integrity of the sites listed in this assessment.

Appendix 1 – Plans and Projects With In-Combination Effects on the River Dee SAC and Moray Firth SAC

- Aberdeen City and Shire Strategic Development Plan
- Aberdeen Local Development Plan 2012
- Aberdeenshire Local Development Plan
- Moray Development Plan
- Aberdeen City Local Transport Strategy (LTS)
- Aberdeen Core Paths Plan (CPP)
- Aberdeen Local Housing Strategy (LHS)
- Aberdeen Western Peripheral Route (AWPR)
- Nestrans Regional Transport Strategy (RTS)
- Aberdeen Offshore Windfarm.

Appendix 2 – All Sites with Potential In-Combination Effects on the River Dee SAC

- OP39 Braeside Infant School
- OP40 Cults Pumping Station
- OP41 Friarsfield
- OP42 Kennerty Mill
- OP43 Milltimber Primary School
- OP45 Peterculter East
- OP48 Oldfold
- OP52 Malcolm Road
- OP57 Craighill Primary School, Kincorth
- OP59 Loirston
- OP62 Aberdeen Harbour, Nigg Bay
- OP64 Ness Solar Farm
- OP69 140 Causewayend
- OP70 35 Froghall Road
- OP71 41 Nelson Street
- OP74 Broadford Works
- OP75 Denmore Road Retail
- OP76 Causewayend Primary School
- OP79 Crown House
- OP81 Denburn and Woolmanhill
- OP87 Pittodrie Park
- OP95 Triple Kirks
- OP97 Victoria Road School
- OP98 VSA Gallowgate
- OP99 The Waterfront, Old Torry
- OP51 Peterculter Burn
- OP102 George Street/ Crooked Lane
- OP103 Former Torry Nursery School
- OP104 Craiginches Prison
- OP105 East Tullos Gas Holder
- OP106 Beach Esplanade (Jimmy Chung's)
- OP108 Mid Anguston
- OP109 Woodend Peterculer

Appendix 3 - All Sites with Potential In-Combination Effects on the Moray Firth SAC

- OP1 Murcar
- OP2 Berryhill, Murcar
- OP3 Findlay Farm, Murcar
- OP7 Aberdeen College Gordon Centre
- OP13 AECC Bridge of Don
- OP53 Aberdeen Gateway
- OP54 Altens East and Doonies
- OP55 Blackhills Quarry, Cove
- OP56 Cove
- OP58 Stationfields, Cove
- OP62 Aberdeen Harbour, Nigg Bay
- OP64 Ness Solar Farm
- OP78 Cotton Street
- OP83 Energy Futures Centre, South Beach
- OP85 King Street / Beach Esplanade
- OP88 Pittodrie Park
- OP106 Beach Esplanade (Jimmy Chung's)
- OP75 Denmore Road