

## **Appendix 3: Responses to Representations**

### **Contents**

<b>Issue 1</b>	<b>Vision</b>	<b>2</b>
<b>Issue 2</b>	<b>Settlement Strategy</b>	<b>6</b>
<b>Issue 3</b>	<b>Preferred Housing Sites</b>	<b>18</b>
<b>Issue 4</b>	<b>Employment Land Allocations and Other Proposals</b>	<b>31</b>
<b>Issue 5</b>	<b>NHS Grampian Healthcare Facilities</b>	<b>35</b>
<b>Issue 6</b>	<b>Undesirable Sites North</b>	<b>39</b>
<b>Issue 7</b>	<b>Undesirable Sites South</b>	<b>76</b>
<b>Issue 8</b>	<b>City Centre and the Network of Centres</b>	<b>109</b>
<b>Issue 9</b>	<b>City Centre Living, a 24 Hour City and Visitor Attractions</b>	<b>134</b>
<b>Issue 10</b>	<b>Quality Places</b>	<b>160</b>
<b>Issue 11</b>	<b>Natural Environment</b>	<b>173</b>
<b>Issue 12</b>	<b>Transport</b>	<b>186</b>
<b>Issue 13</b>	<b>Developer Obligations</b>	<b>196</b>
<b>Issue 14</b>	<b>Resources</b>	<b>204</b>
<b>Issue 15</b>	<b>Business and Industry</b>	<b>216</b>
<b>Issue 16</b>	<b>West End Office Area</b>	<b>219</b>
<b>Issue 17</b>	<b>Affordable Housing</b>	<b>222</b>
<b>Issue 18</b>	<b>Housing Mix</b>	<b>232</b>
<b>Issue 19</b>	<b>Houses in Multiple Occupation</b>	<b>242</b>
<b>Issue 20</b>	<b>Community Facilities</b>	<b>253</b>
<b>Issue 21</b>	<b>Design</b>	<b>256</b>
<b>Issue 22</b>	<b>Other Issues</b>	<b>264</b>

<b>Issue 1</b>	<b>Vision</b>
<b>Section of the MIR to which the issue relates:</b>	Section 1.2 Vision and Objectives
<b>Planning authority's summary of the comment(s):</b>	
<p><u>General support for the Vision</u></p> <p>18, 472, 488: Supports the Vision for the LDP and the approach it takes</p> <p>384: Support the vision of the plan for sustainable transport modes</p> <p>562: Welcomes the objectives regarding regeneration and sustainable places</p> <p>563: Support the requirement for a LDP.</p> <p>591: Agree with proposed modifications to the vision, which promote industry diversification and resilience.</p> <p><u>Comments on the Vision</u></p> <p>367: Emphasise outcomes 2/3 (resources and climate change) as they are essential for human life</p> <p>422: More emphasis is needed on our unique built, historic and natural environment, for underpinning a high quality of life and place.</p> <p>451: Council should introduce controls on activities releasing significant greenhouse gases and carbon and encourage activities that reduce their release.</p> <p>557: Introduction doesn't provide Council's ambitions for growth of city. Feels like "more of the same"</p> <p>619: Supports recognition of Aberdeen Energy Park and Innovation Park as having significant role in the city's research and development in the energy sector. Recommends diversification to emerging fields to support city's economy.</p> <p><u>Planning Bill related issues</u></p> <p>138: Queries how local development plans/local place plans will be guided given the lack of a strategic development plan in the future.</p>	

488: Removing supplementary guidance – don't pre-empt detail of the Planning Bill. LDP must focus on statutory obligations under the current planning regime.

528: The MIR gives no indication of which elements of the existing SG will be incorporated into policy, nor of what status will be given to any Local Policy or Technical Advice Notes.

591: Tentatively agree with review of supplementary guidance documents, but not at the expense of over complicating the local development plan, which should remain succinct and understandable.

### Planning Process

284: There should be no LDP – no development is needed. Too many people and infrastructure is not adequate

445: When the LDP identifies areas as undesirable that should be the end of the story. No further discussion within the five year period.

472: No departure should be allowed from original proposals without full consultation with the residents and local community councils. Changes should not go ahead if the residents affected are against the changes.

472: Strategic plan should not have granted more housing allocations when many still need to be built out. Aberdeen City and Aberdeenshire need to work together to look at cross boundary issues and impact on settlement e.g Blackdog Development.

### Other Issues

385: Recommends reference to recent Historic Environment Policy for Scotland (HEPS) is included in LDP update. HEP3 is highlighted.

544: Many healthcare facilities are pressured and the respondent is committed to working with the Council to identify area for new or improved facilities. Health and social care challenges means that the local development plan should prioritise healthier lifestyles. Considerable investment will be required to maintain high levels of service to support Aberdeen's growing and ageing population. Cross-border issues may require to be addressed where provision of facilities in the City serve areas within Aberdeenshire and vice versa.

## **Summary of response by planning authority:**

### General support for the Vision

18, 472, 488, 384, 562, 563, 591: Welcome support for the LDP's vision and objectives.

### Comments on the Vision

367, 422, 451: We agree that the Proposed Plan needs to focus on climate change and protecting and reusing our existing resources more sustainably, whether they be buildings or land. Our spatial strategy looks to re-balance growth more towards the re-use of brownfield sites, the city centre and existing buildings. This allows our existing infrastructure to be used more effectively and reduces the need for new infrastructure, and indeed greenfield land. The policies in the Proposed Plan look to address climate change though encouraging active travel, promoting heat networks and city centre living.

557: There is a huge supply of housing and business land in Aberdeen which the Proposed PLAN continues to identify and which have been supplemented by significant brownfield and city centre opportunities. The housing supply targets and requirements are ambitious and similar to previous Strategic Development Plan figures. See also comments on housing land in Issue 2 Spatial Strategy.

619: Agree. The Proposed Plan looks to support mixed use communities and as technologies and work patterns change, there may be more localised solutions needed. It may be that Local Place Plans could have a role in identifying these within their own areas.

### Planning Bill related issues

138: The new Planning Bill proposes to replace Strategic Development plans with Regional Spatial Strategies. Details are yet to emerge. However, this Local Development Plan is based on the approved Aberdeen City and Shire Strategic Development Plan.

488, 528, 591: It is now confirmed that Supplementary Guidance will be removed. We agree that the Proposed Plan should not be over-complicated. For this reason, we have incorporated the most fundamental aspects of SG into its policies. More detailed policy will be contained within 'Aberdeen Planning Guidance' documents which will be subject to public consultation prior to adoption by the City Council.

### Planning Process

284, 472: All Scottish Councils have a statutory duty to adopt a Local Development Plan at least once every 5 years. The housing numbers identified in the Proposed Plan are derived from a Housing Needs and Demand Assessment that was prepared to support the Strategic Development Plan. This shows that there is a need for more housing in Aberdeen and the Proposed Plan sets out where we think they should go. It is a legal requirement for the Proposed Plan to identify the requirements of the Strategic Development Plan.

445, 472: The 'undesirable' status of sites in the Main Issues Report is the result of officer's assessments and was released, without commitment, by the Council for consultation purposes. Essentially there is a 3 stage process to identifying sites in an LDP: assessment by professional officers, approval by democratically elected Councillors followed by independent scrutiny by Scottish Government reporters. It is a long process, but also a robust and transparent one. It is also a process set in statute which we cannot change, even if we wanted to.

#### Other Issues

385: Appropriate reference to HEPS will be made in the policies relating to the historic environment.

544: Agree. Planning touches on many aspects of health and wellbeing, including placemaking, active travel, green spaces, noise, air quality and the ageing population. The ALDP Team held a workshop on improving health outcomes of the Local Development Plan during its preparations and the outcomes fed into it where feasible. New health facilities are identified in the Proposed Plan, in consultation with NHS Grampian, and there is a new section and policies dedicated to health and wellbeing.

#### **Planning authority action/recommendation for Proposed Plan**

Identify new health facilities in the Proposed Plan (see Issue 5).

Include a new section and policies to the Proposed Plan dedicated to health and wellbeing.

<b>Issue 2</b>	<b>Settlement Strategy</b>
<b>Section of the MIR to which the issue relates:</b>	Section 2 Settlement Strategy, including housing and employment land allocations.
<b>Planning authority's summary of the comment(s):</b>	
<p><u>General Support for Settlement Strategy</u></p> <p>1, 20, 395, 451, 417, 442, 422, 449, 574: Agree with redevelopment of brownfield/city centre living, and/or no development should be on greenbelt or greenspace.</p> <p>563: Fully support the planners report on the Development Bids Assessments, particularly those bids deemed undesirable in the report.</p> <p>27, 30, 31, 62, 132, 158: Agree with decisions/undesirable designations for the Bridge of Don sites. The area is over capacity in terms of housing and lacks amenities and infrastructure.</p> <p>37, 445: Agree with the undesirable status of bids for large developments around Kingswells</p> <p>94: Support the preferred sites - important to avoid distinct communities coalescing. Maintaining green spaces important to not overwhelm existing / new communities. Retain the build line on Deeside to ensure development does not encroach on landscape.</p> <p>574: Supports the undesirable recommendation of most of housing proposals in Lower Deeside until approved developments are closer to completion and infrastructure is available.</p> <p><u>Comments on Spatial Strategy</u></p> <p>96: The new LDP should protect the junctions of the AWPR from inappropriate speculative development, and particularly large-scale out-of-town retailing.</p> <p>469: Grant permitted development rights to redeveloping existing vacant office space. It should be a requirement of the permitted development that the size of the accommodation betters the minimum internal space standard set out in Main Issue 4 and be zero carbon homes. Set a target of 75% of all homes must be use of brownfield urban sites and thereby reduce the need to build on green-field land.</p> <p>515: Objects to the employment land allocations. Main aim of the local development plan in alignment with the strategic development plan is to promote the need to use resources more efficiently and effectively while protecting assets.</p> <p>534: Disagrees with proposed settlement strategy. Bridge of don does not have enough homes for young people and families to stay.</p>	

542: There is already too much development for a city in decline.

#### General Objections to Further Development

11, 17: Object to further development within Dyce being used for housing

271: Does not support further development in the Plan

284: No need for more housing. No greenfield development. No need for more sites. Use brownfield sites for green space.

472: Few amenities in Bridge of Don for the large population. More infrastructure is required. Concern regarding capacity of schools and medical facilities. Detrimental impact on traffic. Loss of agricultural land. Existing allocations are yet to be built out.

554: No more housing at Bridge of Don, but maybe at Cove or Torry.

538: Bridge of Don has undergone rapid housing development with little or no improvement of infrastructure development. No need to approve additional developments. Development plan should take steps to improve existing infrastructure for the benefits of the residents. Development from allocated sites in the area and the bids will impact on traffic, medical facilities, local schools' capacities and will result in the loss of land in the green belt and green space network.

138: Kingswells doesn't need further expansion to make it sustainable. Previous developments have been controlled to ensure minimal impact on the landscape setting and separate identity of Kingswells. Traffic volumes will increase due to development at Countesswells, Kingsford and Newhills. Additional car-dependent development will add to traffic-situation. It is more important to protect the greenbelt between Kingswells and the City as it will be reduced by developments at Maidencraig, Greenferns and Newhills. Capacity of Kingswells Primary School is an issue and it should not be forced to deal with excessive class sizes.

#### Support for Existing Sites

13: Support the continued identification of Pittodrie as an Opportunity Site for redevelopment for residential use.

518: OP44 – North Lasts Quarry - Support continued identification of quarry as a site safeguarded for mineral extraction in the next local development plan. Requests that a minerals policy which continues to protect quarry sites will be contained in the proposed plan.

#### Comments on Zoning

451, 627: Rezone the CF1 boundary at the core of Old Aberdeen to include only the dedicated university educational properties and the remainder of Old Aberdeen to be re-designated as H1

533: Rigid land use zoning is no longer appropriate in many instances and Plans need to be more flexible to allow quicker decision making, which will assist job creation and employment retention.

#### Other Issues

103, 104: OP116 Froghall Terrace. There are large numbers of student housing and HMOs in the area with attendant noise and litter problems. There are many housing units that have been built but no provision for nursery accommodation or children playing facilities. There is a need for social and sheltered accommodation in this area as it is close to the city centre. There could be low-density housing with affordable homes and green space open to all. New policy should reflect impacts on existing residents and prioritise their needs and rights.

422: Support the Council's undesirable assessment of B09/27 OP112 Contlaw Road

599: Settlement Strategy for Culter needs more homes (not flats) for our local growing families. Sensibly priced mostly 3-bedroom houses, with some outside space. More retirement housing needed. Growth could be limited to 100 houses in total every few years. This level of growth will not cause a detrimental impact on school or doctor surgery capacity. A modest business park. Improvements to the village centre – more parking, fast broadband. As brownfield sites are limited in Culter it is accepted new sites will be on the greenbelt. Proposed sites that are not contiguous with the village, have poor transport links, have major impact on visual character of the area, are difficult to service, or do not have well resolved proposals will not be supported.

599: No provision for Culter in the proposed housing. Need more housing in Culter to ensure a mix of people live within the community. Current LDP sites and non-implementation of the density policy has resulted in a lack of stock. Support the undesirable status of most of the housing sites until exiting developments are closer to completion, and better infrastructure to support further development has been implemented

619: The Beach should be protected as an important asset of the City. Suggests a Beach Masterplan, separate to the CCMP, in consultation with local community and residents of the area.

#### Objection to Existing Sites

472: B02/01 **Gordon Centre (OP7)** Traffic impact on to Ellon Road

472: B02/02 **Balgownie Centre (OP5)** Has planning consent. Impact on traffic. Traffic Impact Assessment will be required.



495, 536, 537, 553, 578, 630: B09/02 **Malcolm Road (OP52)** - Oppose development at this site. Greenfield site, previously green belt and green space network, loss of trees and ancient woodland, unsafe and poor access, the site is not connected by public transport, no numerical justification to allocate further sites, additional traffic generated, site is remote from the village, is not on a bus route and is a refuge for wildlife, existing sewer is at capacity, flooding issues, Cults Academy is near capacity, there are constraints to footpath improvement given third party ownership, adequate housing is already allocated in the current local development plan to meet the demands set in the Strategic Development Plan, impact on the character of the area, lose sense of wellbeing

599: B09/02 **OP52 Malcolm Road** - Do not seek to have the site removed from the LDP. Concerns regarding: density, pedestrian and cycle access, limited Infrastructure capacity (drainage, power and communication), some pressure on education and healthcare services.

106, 456, 459, 501, 553, 574, 628: B09/42 **OP114 Milltimber South** - Objects to the development. No need for more homes, dust permeates existing homes along the road, re-allocate back to greenbelt, the site provides views across the Dee Valley, infrastructure in schools and roads would be required, children would be required to cross a busy road to get to school, Countesswells is better placed to take affordable housing, permanently ruin the identity and attraction of Milltimber, loss of open space and the loss of a tourist attraction, the submitted document contains errors and inaccuracies, and notes that local residents have consistently rejected any proposed development, agree with Council's recommendation that the site is undesirable. Development is not required, there are other more suitable sites elsewhere.

#### Proposed Strategic Development Plan and the Housing Allowances

487: Plan fails to conform with the Strategic Development Plan and Scottish Planning Policy regarding the level of housing land supply. Insufficient homes are being delivered and plans are failing to provide an ongoing marketable and deliverable land supply.

488: Given that housing supply is not a Main Issue, there is no formal opportunity to comment on anything more than the preferred sites— alternatives are not provided.

610: Notes concerns over the calculation of housing need and demand within the PSDP and advocates more generosity for allowances. Notes absence of 'land supply' as a main issue in its own right – does not allow proper opportunity to debate proposal for 4168 new homes between 2021-2031.

591: The Main Issues Report does not identify land supply and the scale of new allocations as a Main Issue, identifying it as a Main Issues would have allowed for debate, as has been the practice in previous Main Issue Reports. The additional land for 640 units is misleading, many sites are ineffective and constrained; the figure should be significantly increased to ensure an appropriate supply of housing land.

488, 583, 591, 610: Impact of the SDP examination on housing figures has to be determined. This may require more land to be allocated.

591: The housing supply target is not ambitious and can contradict the wider aspirations for the regional economy. Accelerated housing delivery and growth can only be achieved by using the High Growth Scenario within the Housing Needs and Demand Assessment.

#### Over-reliance on Brownfield Sites

488, 512, 535: No evidence of the deliverability, programming or timescales of sites within the Brownfield Urban Capacity Study. There is an over-reliance on brownfield land for the delivery of homes (over 80% of the homes proposed). Support a range of locations (as required by SPP) and sizes of sites being allocated to support the delivery of homes in Aberdeen.

535: Brownfield sites pose issues with deliverability.

488: City Centre Living must not be promoted at the expense of land for new housing development.

591: City centre developments whether conversions or redevelopment of brownfield sites should not be promoted at the expense of new greenfield sites.

540: Respondent notes that almost all of the proposed new sites are brownfield sites, and therefore deliverability is dependent on unproven viability. Reference is made to Scottish Planning Policy principles of the need for housing allocations to be effective. A realistic approach to the delivery rates on large sites should be bolstered by the allocation of additional small to medium sized sites.

565: Analysis of Housing Land Audits from 2014-2019, notes a need for a greater supply and range of allocations to supplement existing sites. Suggests an over-reliance on brownfield sites will not meet housing shortfall; notes the content of the BUCS in terms of site ownership and density assumptions.

567: Suggests a reliance on brownfield sites will not meet housing shortfall; notes the content of the BUCS and cites findings of the Housing Land Audits 2016-2019. Recommends further housing allocations are necessary.

577: Expresses concerns about reliance on brownfield sites and their effectiveness with complexities in redeveloping previously used sites. Makes reference to the BUCS; many sites have been available for a number of years and questions viability of them.

582: Preferred housing sites are brownfield or small greenfield, this does not provide an adequate range of sites or promote sustainable mixed communities.

583, 595, 611, 617: An over-reliance on brownfield sites to make up the vast majority of new housing allocations. Brownfield sites should be discounted from the overall calculation unless they are proven to be "effective". An equivalent quantity of effective and deliverable sites should be allocated instead. If included the brownfield figures used should be discounted

heavily to reflect actual opportunities and additional housing land (at least 682 homes) to account for the lack of generosity within the brownfield land figures.

591: Object that 3408 units could come forward from existing Brownfield Sites. Issues with deliverability, many of the sites have vacant for long periods of time, many of the sites are in private ownership with no delivery strategy or timescale, contravenes Para 119 of Scottish Planning Policy which requires local development plans in city regions to allocate a “range of sites” which are effective or expected to become effective in the plan period.

610: Objects to suggestion that 3408 units should come forward through existing brownfield sites. Makes reference to BUCS, needs to updated. No delivery strategy or timescales for sites to come forward. Believes that this contravenes SPP (para 119) that a range of sites should be allocated in the LDP. Notes high reliance on sites that are in Local Authority or NHS ownership.

### Housing Supply

535: Additional sites require to be allocated to ensure a five-year housing land supply is in place at the end of the development plan period.

512: The existing housing allowances should be increased, and additional sites be identified considering local development plans are moving towards a 10-year time frame in the ongoing planning review. Additional allocations should be made in the first period to support recovery of the city and boost economic growth.

525: Additional land requires to be identified for residential development to ensure that a 5-year housing land supply is in place. This should comprise land for development in the first period of the Plan with sites reserved for longer term development.

527: The Proposed Strategic Development Plan’s requires identification of a strategic reserve of housing land. Respondent notes long term allocations are important if proposals in the Planning Bill for 10-year local development plans are implemented.

529: The Proposed Strategic Development Plan’s provision for a strategic reserve of housing land to be identified between 2033-2040. With rapidly changing economic circumstances, there would be considerable benefit in doing that, especially if the current proposals in the Planning (Scotland) Bill giving LDPs a 10-year lifespan are implemented. It would ensure that Aberdeen is ready and able to respond immediately to any increase in demand for housing.

540: Objects to the scale of housing allocations deemed necessary in section 2. Proposed allocations in the MIR fall short of housing requirement set out in the Proposed strategic development plan. MIR identifies a number of new allocations but does not list the allocations carried over from the 2017 local development plan, some of which have already been built out. Analysis on page 8 is based on 2016 HLA which is out of date. Allocations have been rolled forward from the 2017 Local Development Plan, which is accepted, but ongoing expected delivery rates set out in the Housing Land Audit do not expect all the allocations to

be delivered by 2032 - i.e. the lifetime of this LDP. The Proposed plan should seek to allocate 5,239 houses during the 2020-2032 plan period.

557: Notes allocation of only 640 more units over 12-year period – contrary to Prosperous People/ Economy themes. Cites SDP comments by Homes for Scotland again highlights a lack of ambition in the region. Notes that MIR proceeds on the basis of the 2016 Housing Land Audit.

565: Does not agree with preferred housing sites. Not enough land allocated to meet PSDP housing allowances. Brownfield should be considered as additional flexibility and windfall rather than an integral part of allowances.

577: Notes that target relies on existing allocations which has been in place for two Plans, and they do not support a 'do nothing' housing strategy. Cites results of 2014-2019 Housing Land Audits and the shortfall of predicated and actual completions, particularly on larger sites. Respondent notes that the shortfall is being repeatedly pushed back.

582: A more ambitious approach to growth and housing supply target, housing land requirements and housing allowances needed, particularly in the first plan period.

583, 595, 611, 617: Unrealistic expectations on housing delivery from existing allocated sites. It will not address the continued shortfall in housing delivery, will not meet national and regional housing delivery requirements, continuation of the existing strategy. Existing strategy has not delivered the housing needs. Reliant on difficult brownfield sites, an untested SDP, which does not fit with national policy on delivering more housing more effectively.

583, 595, 611, 617: The need to allocate additional housing land to meet Proposed SDP requirements. Additional housing land of around 250 homes per year should be allocated to account for cumulative lack of delivery inherent in Aberdeen's housing land audit predictions.

583, 595, 611, 617: HLAs are inherently inaccurate and over optimistic – a realistic view based on historic delivery trends against projected HLAs should be calculated and allocations made based on the expected shortfall.

477: Object to the proposed housing numbers from the Proposed SDP and therefore object to the sites. They are excessive and unnecessary; housing land requirements to 2032, and an effective 5-year land supply are well accommodated. This will undermine committed sites. The proposal to discount the 2449 constrained greenfield sites on the basis that most of them are part of larger sites is under-estimated and should be re-examined. The barriers to delivery are not substantive as they relate to sites already under construction, supporting infrastructure is being put in place to support ongoing delivery.

477: The city's proposed allocations are in excess of the 640 units identified. In the Preferred Housing Sites, a total of 504-554 units are proposed plus nearly 10Ha of land. Taking a

conservative density this contributes a further 200 homes, taking the proposed number beyond the identified shortfall by some 50-150 units.

### **Summary of response by planning authority:**

#### General Support for Settlement Strategy

Welcome general support for the settlement strategy and site selection process. Note comments on settlement strategy.

#### Comments on Spatial Strategy

96: The settlement strategy for the Proposed ALDP looks to avoid, wherever possible, adding additional burdens to the junctions of the AWPR. We agree that out of town retailing should avoid these areas – major retail proposals should be directed to the current retail hierarchy, with the city centre being the first option.

469: Permitted Development rights are set in national legislation, not Local Development Plans. The Proposed ALDP supports reducing carbon emissions and increasing brownfield housing development. Space standards are dealt with in Issue 10 Quality Spaces.

515: There is no need to identify further employment land – particularly on greenfield sites. The Strategic Development Plan requires 60ha of marketable employment land to be available at all times in Aberdeen in a range of locations. There is in excess of 200ha available on undeveloped greenfield sites with further vacant sites and buildings available within existing industrial estates and business parks.

534: There are already significant allocated sites identified in Bridge of Don including Grandhome, Dubford, East Woodcroft North, the Balgownie Centre and former AECC amongst others. The Proposed ALDP adds further small sites at Dubford, Balgownie and North Denmore. There is therefore no numerical or geographical reason to add any further sites to the area.

542: We would contend that Aberdeen is a city in decline. The housing numbers identified in the Proposed ALDP are derived from a Housing Needs and Demand Assessment that was prepared to support the Strategic Development Plan. This shows that there is a need for more housing in Aberdeen and the Proposed ALDP sets out where we think they should go. It is a legal requirement for the ALDP to identify the requirements of the Strategic Development Plan.

#### General Objections to Further Development

11, 17, 271, 284, 472, 554, 558, 138: The housing numbers identified in the Proposed ALDP are derived from a Housing Needs and Demand Assessment that was prepared to support the Strategic Development Plan. This shows that there is a need for more housing in Aberdeen and the Proposed ALDP sets out where we think they should go. It is a legal requirement for the ALDP to identify the requirements of the Strategic Development Plan.

We would acknowledge that infrastructure capacity is an issue in most parts of Aberdeen. This is one reason why we have focussed our spatial strategy on brownfield and small-scale greenfield allocations. This will help to limit their impact on infrastructure. However, where impacts are generated by new developments, these will have to be mitigated, and developer obligations will be sought. Policies will be in place to allow this to happen.

#### Support for Existing Sites

13, 518: Both Pittodrie and North Lasts Quarry will continue to be identified as opportunity sites in the Proposed ALDP. The current minerals policy protects existing minerals sites and we do not propose to change this.

#### Comments on Zoning

451, 627: The extant ALDP already acknowledges that not all areas designated under Policy CF1 are entirely in institutional use. In assessing proposed changes of use or new developments, regard will need to be given to impacts on the character of the area as a whole and the vitality of any residential community.

533: Whilst it is acknowledged that it can be desirable to have some flexibility in the uses which could be allowed on land or buildings, the ALDP also needs to provide some certainty for landowners, developers and the public in terms of the broad principles which may or may not be acceptable. The Specialist Employment zoning is different from the general Business and Industrial zoning in that it restricts the general industrial and storage and distribution elements. This is to ensure a higher quality business environment is maintained and, in the case of the Innovation Park, to ensure the character and amenity surrounding residential uses are protected.

#### Other Issues

103, 104: The issues of student housing, HMO's and special needs housing have been raised a number of times during the ALDP consultation. As a result, the Proposed ALDP contains new policies on these issues which look to accommodate new developments whilst at the same time look to protect the amenity of surrounding residents.

599: Finding suitable development sites around Peterculter is not easy due to woodland, slope, flooding and schooling constraints. An attempt was made to identify a business area in a previous ALDP, but this was unsuccessful. There are currently 3 residential proposals around Peterculter in the extant ALDP which have yet to be started. Whilst fairly limited in scale, they could provide further housing choice in the area. We propose to carry all 3 sites over into the Proposed ALDP.

619: We would agree that the beach area needs careful management, and whilst the Proposed ALDP does not specifically propose a Masterplan for the beach, this would not prevent one being undertaken should it be necessary.

### Objection to Existing Sites

472: Both the Gordon Centre and Balgownie Centre are brownfield sites whose re-use would be sustainable and preferable to greenfield alternatives. Any planning applications for the sites would need to demonstrate what the transport implications are and how they will be dealt with. We propose to continue to identify both sites in the Proposed ALDP.

495, 536, 537, 553, 578, 599, 630: OP52 Malcolm Road is included as an opportunity site in the extant ALDP. The area is largely cleared of woodland and its limited size of 8 houses means that any transport and infrastructure issues are likely to be limited. Any planning application will require a Flood Risk Assessment and will need to show how access and safety issues can be dealt with in a satisfactory way. There are very few opportunities for development around Culter, and the removal of this site would limit housing choice even further. We propose to continue to identify the site in the Proposed ALDP.

106, 456, 459, 501, 553, 574, 628 Milltimber South: The housing numbers identified in the Proposed ALDP are derived from a Housing Needs and Demand Assessment that was prepared to support the Strategic Development Plan. This shows that there is a need for more housing in Aberdeen and the Proposed ALDP sets out where we think they should go. It is a legal requirement for the ALDP to identify the requirements of the Strategic Development Plan.

Milltimber South is included as an OP site in the extant ALDP. In terms of green belt objectives, the site is surrounded on 3 sides by development, does not provide land for recreation, does not prevent coalescence and has a defensible boundary to the south along the Deeside Line. Whilst the views provided by the site are attractive, they have been altered by the AWPR and it is not considered to be a tourist attraction. Any planning application will need to show how transport, flooding, access and safety issues can be dealt with in a satisfactory way. In considering the site during the Examination of the 2017 ALDP, the reporters concluded that the advantages of the site are sufficient to outweigh the change in landscape character and in the setting of Milltimber that would result from development there. With sensitive design and landscaping, the development would appear as a natural extension of Milltimber and would blend well with its surroundings. We propose to continue to identify the site in the Proposed ALDP.

### Proposed Strategic Development Plan and the Housing Allowances

487, 591: The 2019 Housing Land Audit shows that there are 10,816 housing units in the effective 5-year supply in the Aberdeen Housing Market Area. This equates to 7.2 years supply against a 5-year requirement. Altogether there are nearly 33,000 housing units in the established supply in the Aberdeen HMA – this figure includes the post 5-year effective supply and the constrained supply. This represents a significant and generous supply which is further augmented by sites in the Proposed ALDP in line with the requirements of the Strategic Development Plan.

488, 583, 591, 610: The Proposed ALDP meets the housing allowances required by the Strategic Development Plan and the means by which it does so is set out in the Settlement Strategy. The focus is on identifying smaller scale and brownfield sites whose impacts on existing infrastructure can be accommodated. Such sites are more sustainable, and they should not present a challenge to the delivery of existing strategic sites which might arise from further large greenfield allocations. It is not the function of the ALDP to revisit the scenarios considered in the Housing Need and Demand Assessment. This is used to help determine the Housing Supply Targets in the Strategic Development Plan. The Strategic Development Plan has ambitious growth targets, which reflect previous plans, and which are set out in the Proposed ALDP.

488, 591, 610: Housing land supply was not considered to be a main issue because the housing allocations identified in the Proposed ALDP represent a continuation of the generous and ambitious growth strategies of previous plans. Nor does it prevent anyone commenting on the subject.

#### Over-reliance on Brownfield Sites

488, 512, 535, 540, 565, 567, 577, 582, 583, 595, 611, 617, 591, 610: It is accepted that the majority of new allocations are brownfield. However, if we include the existing housing allocations carried over from the extant ALDP, then the majority of allocations in the Proposed ALDP are greenfield. Table 3 of the 2019 Housing Land Audit shows that only 17% of the established land supply in Aberdeen City is on brownfield sites. This figure drops to 13% if the whole of the Aberdeen Housing Market Area is covered. The new brownfield allocations therefore represent a move towards re-balancing the greenfield/brownfield split which has always favoured greenfield sites. This will help to bring the Proposed ALDP more into line with the Strategic Development Plan target for at least 40% of all new housing in Aberdeen City to be on brownfield sites.

There appears to be an assumption that brownfield sites are somehow less deliverable than greenfield sites. Little in the way of evidence is presented to support this. Whilst we acknowledge that some brownfield sites appear to be 'stuck', there are greenfield sites in a similar position. It is therefore important that plans promote conditions which allow all suitable sites to come forward. Adding yet more greenfield sites to an already generous supply is unlikely to achieve this. We would accept that the Brownfield Urban Potential Study should be updated, and this has been done to support the Proposed ALDP.

'Generosity' is added to the housing supply target at the Strategic Development Plan stage to form the housing land requirement. Local Development Plans are not in a position to add further generosity at this stage.

488, 591: Brownfield and city centre masterplan sites have not been included in the Proposed ALDP at the expense of greenfield sites. They are additions to the already generous greenfield supply and thereby provide for a range of sites as required by paragraph 119 of Scottish Planning Policy.



## Housing Supply

The 2019 Housing Land Audit shows that there are 10,816 housing units in the effective 5-year supply in the Aberdeen Housing Market Area. This equates to 7.2 years supply against a 5-year requirement. In addition, there is another 17,420 housing units in the post 5-year effective supply in the Aberdeen Housing Market Area. Altogether there are nearly 33,000 housing units in the established supply in the Aberdeen HMA – this figure includes the effective and currently constrained supply. This represents a significant and generous supply which is further augmented by sites in the Proposed ALDP in line with the requirements of the Strategic Development Plan.

There are sufficient allocations already in the Proposed ALDP on a wide range of sites to allow for a significant increase in housebuilding. It is difficult to see how the identification of further sites would increase this further.

In addition to the above figures, the Proposed ALDP identifies a further 3440 units at Grandhome, Greenferns Landward, Greenferns and Rowett South which are phased beyond the lifetime of the current Plan. The Strategic Development Plan does not require the identification of more land beyond the 10 year lifetime of the ALDP, but we will continue to identify these sites. However, there is neither the requirement or the need to identify further housing land or longer-term strategic reserve land.

583, 595, 611, 617: Housing Land Audits are agreed with housebuilders prior to publication. Although there may be occasional disagreements over individual sites, the overall methodology and approach is well established and agreed.

477: Discounting the constrained greenfield sites from the requirements calculation is reasonable at this stage. There is still a need for the Proposed ALDP to identify a range of sites to support housebuilding, and to re-balance the greenfield/brownfield supply which, as mentioned above, currently favours greenfield sites. Brownfield sites are generally considered to be more sustainable than greenfield ones in that they make better use of existing land, buildings and infrastructure resources. We therefore want to try and accommodate more of the housing need that exists in Aberdeen onto brownfield sites.

### **Planning authority action/recommendation for Proposed Plan**

In response to the Examination Report into the Strategic Development Plan, further housing allocations will be made in order to meet the additional allowances.

<b>Issue 3</b>	<b>Preferred Housing Sites</b>
<b>Section of the MIR to which the issue relates:</b>	Section 2 Settlement Strategy
<b>Planning authority's summary of the comment(s):</b>	
<p><u>General</u></p> <p>1, 18, 368, 479: Agree with focus on redeveloping brownfield sites.</p> <p>138: Respondent agrees with preferred housing sites but has reservations about desirability of B03/20 (Old Skene Road). Agrees that there is a generous supply of housing land. Agrees that brownfield sites should be prioritised, and greenfield housing allocations be small-scale.</p> <p>238, 422, 445, 456, 561: Agree with preferred housing sites.</p> <p>271, 272: Encourage retention/ enhancement of green infrastructure. Does not support further housing sites</p> <p>551: Development should be focussed in existing settlements to minimise impact on countryside and need for new infrastructure.</p> <p>318: Residential and commercial supply currently seems surplus to requirements in Aberdeen. Education sector is the only one prospering.</p> <p>390: Respondent notes there are too many suburbs</p> <p>560: Identify smaller sites around the city so main routes aren't congested.</p> <p>469: Do not agree with the preferred sites. Any sites which have already been re-purposed such as into community gardens or open space should be removed from the housing bank.</p> <p>496, 591, 595: Object to the preferred housing sites. These are mostly brownfield or small scale greenfield sites. This does not provide adequate range of site, as required by SPP to promote sustainable mixed communities. Further greenfield sites, free from constraints and capable of delivery are required. Many of the sites are in public ownership (local authority or NHS), have not been deemed surplus to requirement, are single use, and have not outlined site capacity therefore the preferred sites may not be able to deliver the housing land supply. There is an overreliance on slow delivery large scale allocations and difficult brownfield housing sites. Brownfield sites should be considered as additional flexibility.</p> <p>532, 582: Disagree with preferred housing sites as identified.</p> <p>361: Suggests developing Richard's Textile Works site</p>	

368: Kincorth Academy site not listed in preferred sites.

583: MIR does not allocate enough land to meet PSDP housing allowance, reliant on slow delivery large scale allocations and problematic brownfield sites. Large allocations delivery should be spread over a longer period. Strategic Reserve Land is required

383: Land identified for community stadium should be identified for housing at Loirston. Use Classes 4/5/6 not suitable as they would be incompatible/ adversely impact on residential areas of Loirston and an overprovision in the south of the City.

384: Notes Network Rail's Control Period and Aberdeen to Inverness Rail project falls within the LDP area. There are long term planning measures in place for connectivity aspirations for Scotland set by Scottish Government and this may place greater demand on the network.

#### New Housing Allowances beyond 2032

1, 18, 20, 23, 35, 37, 138, 286, 291, 292, 390, 456, 472, 561, 563, 574, 599: No further housing needed.

238: No further housing sites should be identified beyond 2032 – by that time the city will have grown considerably and green space could be too scarce to be allowed to be developed.

361: 2032 is too far in the future - general locations should be identified for now

366: No requirement for new housing sites. The identity/ character of the Granite City is being diluted by the volume housebuilding developments.

445: Further development will lead to significant traffic problems and exacerbate existing issues.

451, 473, 477: No requirement due to current market conditions. Existing sites need to be built up.

469: Reuse existing vacant office buildings, and vacant and derelict land.

457: Irrelevant as you cannot predict population trends that far into the future. The type of economy likely to exist in Aberdeen at that time cannot be forecasted at present. Any attempt to forecast at 2032 and beyond is of no value and meaningless.

479: No requirement. Population is falling and we have an oversupply of housing stock. Population forecasts used have been excessive

542: Not until actual plans are developed to show a requirement. Oil is in decline and the requirement for homes is declining.

28: Yes, depending on circumstances at the time

368, 557, 560: Yes there is a need to identify further Allowances beyond 2032

554: Yes identify housing beyond 2032 but with flexibility in population/ economic changes.

386: Notes that large scale development makes up most of the allocations for housing development - risk that these sites fail to come forward. Identify sites for reserve housing land for post-2033.

488: The Proposed SDP provides an opportunity for "Strategic Reserve" land to be considered for longer term housing. Aberdeen City historically has been good at identifying strategic reserve land and should continue with this long-established practice. It provides certainty to home builder and communities.

565: Agrees that long term delivery periods should be recognised. PLDP should include Strategic Reserve Sites like Aberdeenshire Council.

591: Object to the non identification of Strategic Reserve Land. Keep consistency with the Aberdeenshire Local Development Plan. It would provide certainty to the development industry and local communities, and allow for flexibility if there is a shortfall in housing land supply.

595: Requirement to identify further sites due to the slow nature of developing out large development sites. Strategic Reserve Sites need to be identified.

610: Objects to lack of Strategic Reserve sites. This would provide industry with certainty for future growth of the City.

#### B1101 Garthdee Road

2, 3, 8,12, 7, 19, 107, 10, 4, 578, 460, 466, 493, 497, 504, 505, 508, 513, 524, 550, 566, 569, 570, 573: Land should be retained as greenspace/green belt.

2, 3, 8,12,10, 4, 19, 460, 550: Bus and/or school services will be over capacity,

2, 3, 8,12, 7, 45, 460: There will be issues with privacy and overlooking, over shadowing and parking for existing residents.

2, 3, 8,12: Drainage and sewerage, power supply, obstruction of natural light, noise pollution during construction, and quality of life impact of any long term development is a concern  
2, 3, 8,12, 10, 19, 460, 466: Traffic access, road safety and congestion issues

2, 3, 8,12, 10, 102, 107, 108, 368, 460, 466, 493, 497, 494, 504, 505, 508, 511, 513, 524, 531, 550, 566, 569, 570, 573: This will impact negatively on the Gwens Garden project and the community who use the area as a greenspace. Plans to turn the space into a community garden, wooded area, and conservation space, which aims to promote biodiversity and reforest the field

2, 3, 8,12, 10, 460, 466: Development would create construction noise, and soil extraction

7, 10, 460: Medical centre is over capacity

457: Increase in flood risk due to water run off.

460, 466, 524, 550: The development could impact on daylight, overdevelopment of the area. Drainage concerns from the site which could affect neighbouring properties

466, 493, 550: Area should be used for wildlife/biodiversity and recreation.

494, 511: Existing housing supply is sufficient.

505: Site occupies an elevated position and development would be highly visible, having significant landscape impact. Allocation of the site would be contrary to the Council's Open Space Strategy. Residential development on a site currently being used for food growing is contrary to the Council's intentions on the preparation of the Food Growing Strategy.

531: Climate change is a serious issue. Respondent requests the Council to focus on mitigation.

543: The description 'small housing development in conjunction with community planting/open space provision' sounds positive. Seeks clarification on the meaning of community planting/ open space provision in the local development plan and requests it to be listed as a site-specific developer requirement. If tree planting is proposed it should be with native tree species.

564: We agree with much of the officer's assessment of this site. Its location within an established and built up residential neighbourhood with good transport connectivity makes it ideal as a location for much needed new housing within the city. Site should not be limited to just 20 units and that a higher figure should be attached, caveated with a site allocation description requiring a portion of the site to be retained for community planting and woodland. Thereby allowing an appropriate solution to be identified without unduly compromising the development potential of the site.

#### B1102 Kaimhill Outdoor Centre

3, 12: Support the proposal to build Council Housing on this site (not private development). The loss of the community amenity and facility must be offset with significant and meaningful investment. There must be no increase in pressure on local services.

564: We agree with much of the officer's assessment of this site. The greenspace allocation for the site should be removed and the site formally allocated for development in the emerging LDP, with the requirement to retain the children's play area as part of any future development. We believe that capacity should be "indicative" in order to allow flexibility for a future detailed planning application. This also allowing for school capacity issues to be realistically addressed.

368: Development should be sympathetic to area.

6: Site contains a bowling green and tennis courts. Text should specifically refer to the need to provide compensatory facilities where appropriate.

#### B0106 Cordyce School, Dyce

11, 17: Object to the housing development. Land was proposed for community facilities, a garden centre / a leisure centre. Dyce has overstretched health, education and non-existent leisure facilities.

16, 36: Object to the housing development. Parkhill fishing beats are located on the River Don at this location. They are hugely important to the Aberdeen and District Angling Association and the organisations purpose to facilitate affordable game fishing for all.

105: Surprised to see the site includes area occupied by Dyce Community Orchard which has fruit trees, raised bed garden, mixed hedges and a wildflower meadow. Respondent seeks clarity that area will be removed from future plans and left green.

366: Disagrees with housing proposal at Cordyce (B01/06) - notes an overprovision of housing with Stonewood and Mugiemooss Road. Preference for community uses at Cordyce for residents of new developments and existing to utilise.

448, 549: Disagree with allocation because it is zoned as green belt and is valuable public amenity land. May lead to further development.

564: Supports recommendation for housing development. Whilst the site is supported for housing development, it has the potential to accommodate other uses and so we would support a future allocation providing some flexibility around this.

625: Notes this is a LNCS and was previously identified as a green corridor and importance in woodland habitat network.

625: Respondent advises that where a site (or part of) has known flood risk, must be accompanied by a satisfactory Flood Risk Assessment and appropriate buffer strip to the watercourse will be required for development.

21, 366: Cordyce School site (B01/11) would be more suitable for a healthcare or health fitness facility than for housing.

#### B03/20 Land at Old Skene Road

138: Queries practice of locating homes close to the A944 which has become busier since the AWPR opening and traffic is likely to increase with Countesswells and Kingsford developments. Housing would overlook Den Burn valley however if they don't exceed 2 storeys and have tree screening on the east, they could be acceptable. Site is greenbelt and development could be used to justify further development which would be undesirable. Development would be car dependent.

#### B06/01 Don Street

366: Conservation Area should be protected better with too much development and HMOs, not enough preservation. The infrastructure in the area (such as traffic) will be strained with further housing development.

489: Supportive of its allocation in the proposed Local Development Plan as a Brownfield Opportunity Site for residential development of 50 homes. (likely to accommodate a flatted development with a number of 1 bedroom Apartments)

633: Seaton Park, to the west, was flooded during the December 2015- January 2016 flood event. This event has an approximate 1 in 200 year return period. However, it would appear that this site is considerably elevated above the functional floodplain of the River Don. Flood Risk Assessment may be required.

#### B02/08 WTR site at Dubford

472: Site is greenfield and greenbelt and should be protected. Part of the Greenfield Network

527: Supports allocation of site.

529: Supports proposed allocation of site. Housebuilder would facilitate a pedestrian access to Dubford development.

538: Site is located in green belt and greenfield network and should not be developed. Close to Scotstown Moor Local Nature Reserve. Strong reservations on safe access to schools for children. Nearest school is 1.6 miles from the development and there is a lack of safe pedestrian footpaths. Respondent notes that given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

633: Respondent advises that where a site (or part of) has known flood risk, must be accompanied by a satisfactory Flood Risk Assessment – this is a Potentially Vulnerable Area (PVA) of the national FRA (2011).

#### B02/22 Land at Denmore

472: Site is greenbelt. Part of the Greenfield Network. Should be protected

473: Oppose development of the site. The site provides open space to the local community and is used for recreation. There is limited open space in the wider area, the loss of open space would be detrimental. This would be over development, housing allocations are not required in the area. 02/08 WTR site is sufficient.

Existing sites need to be built out – Grandhome

538: Site is located in green belt and greenfield network and should not be developed. Aim of the green belt is to maintain the distinct identity of Aberdeen and the communities within

and around the city. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

564: Agree with the recommendation. The site has good potential as a housing site to support the need for increased delivery of new housing across the city. The site is located within a desirable location and is fully deliverable within the LDP timescales.

#### B02/25 Balgownie Area 4

472, 538: Traffic implications from Grandhome will have implications for local infrastructure and services. This proposal will only add to the concerns of traffic flow/road safety/air quality. Site is greenbelt. Part of the Greenfield Network. Should be protected. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

512: Supports identification of site for residential development. References are made to representations submitted for site B02/23 Balgownie. Notes site scores well in the site assessment. Agrees that the site is hardly used, and its sporting potential is limited. Respondent notes that this is the position they take on the promotion of the entire site. Tree with a tree preservation order and landscape features will be taken into consideration as part of the formal application process.

633: Respondent advises that where a site (or part of) has known flood risk, must be accompanied by a satisfactory Flood Risk Assessment. Respondent has identified sites that fall into a Potentially Vulnerable Area (PVA) of the national FRA (2011).

#### B02/01 – Gordon Centre, Bridge of Don

538: Concerned on impact on existing traffic network. Applicant form is vague and does not indicate any benefits to the community. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

#### B02/02 – Balgownie Centre

538: Bid already has conditional planning consent. All the conditions attached to the planning consent would have to be undertaken. 171 Dwellings will produce a lot of traffic and safeguards on traffic management are imperative.

#### B07/02 – Raeden (eastern part)

543: Welcomes that the presence of the trees is acknowledged in the issues section with the comment that only a small part of the site may be suitable for housing. Recommend that the trees are surveyed and retained on site, with appropriate Root Protection Areas. If it is considered that the site is appropriate for development then only the part that is considered suitable for development should be listed as a site allocation in the local development plan.

544: Supports strategy to encourage brownfield development within the city. Welcomes inclusion of site.



B03/13 – Summerfield House

544: Supports strategy to encourage brownfield development within the city. Welcomes inclusion of site.

554: Disagrees with development at Summerfield House.

633: Potential surface water flood risk – this is a matter for Aberdeen City Council in consultation with relevant internal specialists in the Flood Prevention Unit. Surface water management measures to be considered in detail to ensure no increased risk downhill of the site.

B03/19 – Woodend Hospital

544: Supports strategy to encourage brownfield development within the city. Welcomes inclusion of site.

554: Disagrees with development at Woodend Hospital.

625: Should be considered with its current role in natural flood management. Respondent advises that where a site (or part of) has known flood risk, must be accompanied by a satisfactory Flood Risk Assessment. Respondent has identified sites that fall into a Potentially Vulnerable Area (PVA) of the national FRA (2011).

B08/02 – Frederick Street, B08/04 – Urquhart Building, B04/03 Mastrick Clinic, B08/03 Resource Centre

544: Support the inclusion of these sites.

B0402 – Granitehill Central

564: The allocation of this site would support its redevelopment to the benefit of the local area by bringing the site into a use that is wholly compatible with surrounding housing. At present the site detracts from the appearance of the immediate area. It is unlikely to succeed for future employment uses given the availability of such land across the city area, many of which are in more desirable and marketable locations. The proximity to other business and industrial uses need not prevent the site from being delivered for new housing, as has been the case in other parts of the city. Any required mitigation solutions could be identified at a detailed planning application stage.

633: Potential surface water flood risk - – this is a matter for Aberdeen City Council in consultation with relevant internal specialists in the Flood Prevention Unit. Surface water management measures to be considered.

B04/01 Granitehill North

581: Support allocation of this site for housing development. Site for 200 units on former commercial premises, note MIR states 100 units. Understand this is a typographical error

Support approach to develop a combined masterplan with B04/02. Comments submitted relate to 'Relationship to exiting settlement' of the sustainability assessment.

#### B001 Bucksburn Primary School

633: Requirement for Flood Risk Assessment (to assess flood risk from Bucks Burn) However may demonstrate that all development is outwith any flood risk areas.

#### **Summary of response by planning authority:**

##### General

1, 18, 368, 479, 138, 238, 422, 445, 456, 551, 560, 561: In general these comments support the approach taken to identifying brownfield and smaller scale greenfield opportunities. We believe that there are ample greenfield and large scale development already identified in the current ALDP.

361, 368: Both Kincorth Academy and Richards Works (Broadford Works) are identified as brownfield opportunity sites in the Proposed ALDP.

469: Agree – see comments below on B11/01 Garthdee Road and B01/06 Cordyce.

271, 272, 318, 390, 532, 582: In general, these comments do not support the housing sites identified. We think our focus on brownfield and small scale sites is sustainable. This will help to limit their impact on infrastructure. However, where impacts are generated by new developments, these will have to be mitigated and developer obligations will be sought. Policies will be in place to allow this to happen.

384: Noted.

496, 591, 595, 583: Our spatial strategy looks to re-balance growth more towards the re-use of brownfield sites, the city centre and existing buildings. This allows our existing infrastructure to be used more effectively and reduces the need for new infrastructure, and indeed greenfield land. There is a huge supply of housing land in Aberdeen which the Proposed ALDP continues to identify and which have been supplemented by significant brownfield and city centre opportunities. The housing supply targets and requirements are ambitious and similar to previous Strategic Development Plan figures.

383: The Proposed ALDP does not identify any actual land for a community stadium at Loirston. It is for the masterplan to identify the broad scale and layout of development there. The recent Loirston Development Framework refresh outlines alternative uses for the community stadium site should it no be developed there.

#### New Housing Allowances beyond 2032

There are two groups of responses on this issue – one which believes that the ALDP should identify further housing land beyond 2032 and those who think it should not. The ALDP

needs to make sure that there is a five year effective supply of housing land throughout the 5 year lifetime of the ALDP – this effectively equates to a ten year period.

The 2019 Housing Land Audit shows that there are 10,816 housing units in the effective 5 year supply in the Aberdeen Housing Market Area. This equates to 7.2 years supply against a 5 year requirement. In addition there is another 17,420 housing units in the post 5 year effective supply in the Aberdeen Housing Market Area. Altogether there are nearly 33,000 housing units in the established supply in the Aberdeen HMA – this figure includes the effective and currently constrained supply. This represents a significant and generous supply which is further augmented by sites in the Proposed ALDP in line with the requirements of the Strategic Development Plan.

There is no requirement for local development plans to identify land beyond that period, although the current ALDP identifies 3440 units at Greenferns, Grandhome and Newhills which could come forward during that time. There is no need to add further areas because there is already a very healthy and long term housing supply in place. This could be further augmented during the lifetime of the ALDP with windfall sites, constrained sites, brownfield sites and city centre masterplan sites.

The Strategic Development Plan does not require the identification of more land beyond the 10 year lifetime of the ALDP, but we will continue to identify these sites. So there is neither the requirement or the need to identify further housing land or longer term strategic reserve land.

#### B1101 Garthdee Road

There has been a lot of local interest in this site, most of it supporting its retention as green space. Currently the land is zoned as green belt. The purpose of green belt is to maintain the landscape setting of the city, provide land for recreation and direct development to the most appropriate places. In this case the landscape value of the site is limited to the local area. The consultation has made clear that the site is much valued by the community who have set up a project to turn the space into a community garden and woodland. The site therefore provides the type of doorstep recreational facility that justifies its current green belt status. It is unclear whether the whole site is required for the garden and woodland. However, given that the possible development of Kaimhill Outdoor Centre (see next site) would require some compensatory recreational provision in the local area, then this site could become the focus for that.

#### B1102 Kaimhill Outdoor Centre

Feedback on this site has been generally positive and focusses on the need to provide compensatory provision to offset the loss of recreational facilities, albeit ones that have not been used for some time. The site at Garthdee Road may provide an opportunity for that, but the issue would be dealt with at the time of a planning application. We would intend to maintain the site capacity at 35 as originally proposed.

#### B0106 Cordyce School, Dyce

A number of valid comments have been made on site constraints – notably flooding, amenity land, wildlife, fishing interests and the community orchard. We would agree that none of these areas are suitable for development because of those constraints. These areas should therefore continue to be protected by the green belt and green space network zoning. However, the footprint of the former school, along with the higher land immediately behind it (looking from the south) is largely free of constraints, and much of it is brownfield. The site is well connected and there is school capacity in Dyce. It presents a sustainable development opportunity within an attractive setting.

A number of uses have been proposed, including a health and fitness village, housing and a garden centre. The NHS proposal for a health centre has been withdrawn (see Issue 5). It is considered that the site could be suitable for any of these uses, either on their own or in combination.

#### B03/20 Land at Old Skene Road

This is a small scale proposal of 14 houses and it is considered that its impact on local infrastructure, including the road network, is limited. Its identification as an OP site is not considered to set a precedent, as other bids in the area are still considered undesirable. The site is within walking distance of some services and public transport.

#### B06/01 Don Street

The current building is unsightly and does not merit protection. A well designed development should be able to complement the conservation area. The site is well connected to local services and facilities and is next to a major public transport route along King Street. Flood events in the vicinity of the site in Seaton Park means that a Flood Risk Assessment is likely to be required.

#### B02/08 WTR site at Dubford

Whilst the site is green belt, it makes little or no contribution to green belt landscape objectives and does not provide land for recreation. The current buildings are unattractive and it should be possible to improve the appearance of the site with well designed development. However, it is considered that a flatted development of 20 units is too much for this small site and would appear incongruous in these surroundings. A lower number of housing, rather than flatted units would be more appropriate. The site is not part of the green space network. This is a small-scale proposal on a brownfield site and impacts on local facilities are likely to be limited. Nearby areas are at risk of flooding so a Flood Risk Assessment may be required.

#### B02/22 Land at Denmore

The site is an undeveloped area that was once reserved for local facilities, although none have been attracted there despite repeated attempts at marketing the site. It is not green belt or green space network – around half the site is zoned Residential, the other Urban

Green Space. A small scale development is unlikely to impact significantly on local facilities. It is well connected to public transport and it is considered that there are other more attractive open space areas around North Denmore, including Scotstown Moor.

#### B02/25 Balgownie Area 4

This is a very small scale proposal of 15 houses whose impact on local services and infrastructure will be limited. Whilst it is currently zoned as Urban Green Space, its recreational value is limited, unlike the rest of the surrounding area. A Flood Risk Assessment may be required.

#### B02/01 – Gordon Centre, Bridge of Don

This is an existing brownfield proposal which is already identified in the extant ALDP as OP7. As such it is considered more sustainable than greenfield alternatives. As such we would intend to continue to identify the site in the next ALDP.

#### B02/02 – Balgownie Centre

This is an existing brownfield proposal which is already identified in the extant ALDP as OP5. As such it is considered more sustainable than greenfield alternatives. The site has planning consent for housing and transport impacts will have been taken into consideration in determining the application. As such we would intend to continue to identify the site in the next ALDP.

#### B07/02 – Raeden (eastern part)

We would agree that the trees are an important element on this site. A Tree Survey compliant to BS 5837 will be required.

#### B03/13 – Summerfield House

The site is currently used as an office by NHS Grampian. It is a brownfield site which is in a residential area and close to services, facilities and public transport. A residential use would be appropriate. There is evidence of surface water flooding which would need to be addressed through a Flood Risk Assessment.

#### B03/19 – Woodend Hospital

Woodend Hospital is a significant brownfield site which is in a residential area and close to services, facilities and public transport. A residential use would be appropriate. Because it is a large site there are a number of issues which would need to be addressed, including the presence of open space, trees and listed buildings. It is also next to the Den Burn, albeit generally well elevated above it. These issues will need to be addressed in a Masterplan and Flood Risk Assessment.

#### B08/02 – Frederick Street, B08/04 – Urquhart Building, B04/03 Mastrick Clinic, B08/03 Resource Centre

Support welcomed.

#### B0402 – Granitehill Central and B0401 Granitehill North

These two sites lie adjacent to each other on industrial land in Northfield. On page 9 of the Main Issues Report, Granitehill North has 100 homes and Granitehill Central has 170 homes. This is an error and the figures should have read 200 and 170 respectively.

As they stand, the two proposals are very similar and have been prepared by the same consultants. They total 370 homes comprising 70 2/3 bed houses and 300 2 bed flats. Our view is that this does not represent the diversity of housing mix that we would be looking for. The site is in an established housing area and we should be seeking a greater mix of both smaller and larger units, with more housing to reflect what's already in the surrounding area. This is likely to reduce the capacity of the site from the 370 which was actually proposed, to something approaching the 300 quoted on the Main Issues Report.

This represents an opportunity to regenerate an ageing industrial estate and provide a good mix of homes in an established housing area. There are some schooling and surface water issues that would need to be addressed. Both sites should be considered together in a Masterplan.

#### B001 Bucksburn Primary School

See also response contained in Issue 5 NHS Grampian Healthcare Facilities. This is an unused brownfield site which is surplus to requirements. It would be suitable for a new health centre or other uses compatible to a residential area. A Flood Risk Assessment may be required.

#### **Planning authority action/recommendation for Proposed Plan**

1. Remove B1101 Garthdee Road as a preferred housing site and retain the site as Green Belt.
2. Continue to identify B1102 Kaimhill Outdoor Centre as an OP site for 35 houses. Play park area should be retained and compensatory recreational provision made in the local community. The Green Space Network policy should be removed from the development part of the site, but retained on the open space (play park) area.
3. Zone the development footprint of B1106 Cordyce School as mixed use and identify is as an opportunity site. The remainder of the area (the riverside, the parkland to the south and the community orchard) would remain as green belt and green space network. A Flood Risk Assessment will be required.
4. Identify B0208 WTR Site as an opportunity for a small scale residential development. Pedestrian access into the adjacent development and a Flood Risk Assessment will be required.
5. B0402 – Granitehill Central and B0401 Granitehill North – identify site for 300 units.
6. Identify all other Preferred housing options as opportunity sites in the Proposed Plan.

<b>Issue 4</b>	<b>Employment Land Allocations and Other Proposals</b>
<b>Section of the MIR to which the issue relates:</b>	Section 2.2 Employment Land Allocations and Section 2.3 Other Proposals.
<b>Planning authority's summary of the comment(s):</b>	
<p><u>Suggestions for new development proposals</u></p> <p>4: There are other areas further along Inchgarth Road which would be suitable for redevelopment</p> <p>20: Agree with approach. More sites will come forward as the oil industry shrinks</p> <p>37: Site on Lang Stracht that was proposed to be Morrisons</p> <p>318: Numerous granite buildings around the harbour that could be reused for office, retail and hospitality</p> <p>368: Yes other sites could include Kincorth and Torry Academy</p> <p>554, 560: Suggests Old Mill buildings on Hutcheon Street and other small derelict sites.</p> <p>613: Stonewood Primary School, currently vacant and vandalised. Suggests community consultation to prioritise development of old school sites for new community purposes.</p> <p><u>No need for further Sites</u></p> <p>368, 451: No need for further commercial units - use existing premises. Vacant commercial sites could be used for housing instead of greenfield land.</p> <p>445: None in the Kingswells area</p> <p>479, 563: No further sites required</p> <p>477: Support the approach not to identify further employment land, and to delay the release of Strategic Reserve Employment Land until 2032-2043.</p> <p><u>Re-Purposing Employment Land</u></p> <p>469: Focus should be on redeveloping existing vacant office space (Reference to Savills report late 2017 2.1m sq ft of office space available in Aberdeen). Grant permitted development rights to do this. Require that developers re-purpose vacant &amp; brownfield sites</p> <p>469: The 35ha of vacant and derelict land should be repurposed, derelict land is linked to health inequality and deprivation. Communities close to these areas should be supported.</p>	

568: MIR gives an oversimplistic approach to Employment Land. Existing employment sites are in less established areas (Murcar) so a wider range of sites should be offered.

477: If employment sites remain abundant throughout the plan period, consideration must be given to employment uses within masterplan sites. Flexibility on employment sites will be necessary to avoid leaving employment sites empty, as individual phases are delivered their continued delivery relies on the completion and supporting infrastructure offered by previous and neighbouring phases. Sites must not be constrained by hard-line approaches over their use, if that use is simply not in demand or required by new residents in that location at that time.

477: Request that allowances are made in the next LDP for masterplan sites – whereby areas zoned for employment uses to be modified, where those proposals support the aims of the LDP (high-footfall/town centre appropriate) and the overall masterplan, particularly where they are not in demand as employment sites. The amount of employment land should not be reduced but delivered later in the process. Equally, proposals for more varied employment opportunities should also be supported.

#### Other Proposals

5: B0301 Kingsford - Development represents a serious erosion of the Green Belt. It is a deliberate misrepresentation to claim that it is brownfield. The development is a threat to the coalescence of built up areas between Westhill and the City of Aberdeen. By approving the development, planners were neglectful of their public responsibilities in not ensuring that that the Councillors fully recognised this, and in failing to make the developers aware of the Council's unequivocal determination to maintain these boundaries.

13: B0301 Kingsford - Supports the inclusion of this site.

480: B08/03 (Resource Centre City Hospital)

Any proposed retail development on the site should be of a limited scale so as to protect the primacy, vitality and viability of Aberdeen city centre.

#### **Summary of response by planning authority:**

##### Suggestions for new development proposals

4: Other sites along Inchgarth Road are considered under Issue 6 Alternative Sites.

20: Noted. Brownfield sites are monitored regularly and it is likely that more will come forward during the lifetime of the ALDP.

37: This is the former Summerhill Academy site. It is already identified in the extant ALDP as OP93 for housing. We will carry this proposal forward into the next ALDP.

318: We would agree that there are a number of good granite buildings around the harbour that would be suitable for alternative uses. In areas currently zoned as Mixed Use this should be possible in principle.



368: It is understood that Torry Academy will be used for community uses. Kincorth Academy is already identified in the extant ALDP as OP105 for housing. We will carry this proposal forward into the Proposed ALDP.

554, 560: This is the former Broadford Works site. It is already identified in the extant ALDP as OP74 for housing. We will carry this proposal forward into the Proposed ALDP.

613: Nearly all vacant schools in Aberdeen, including Stoneywood Primary, are located in the R1 Residential land zoning. This would allow for them to be used for community purposes if that was considered appropriate.

#### No need for further Sites

These representations generally support the stance of not identifying any further employment land. There is currently a very generous supply of employment land and there is no requirement to identify further land in the Strategic Development Plan.

#### Re-Purposing Employment Land

469: Permitted development rights are set nationally and the ALDP cannot change these. Nevertheless we support the re-use of land and buildings where they have reached the end of their useful lives. This Proposed ALDP very much focusses on the redevelopment of brownfield sites and re-purposing land and buildings where appropriate. Most of the new housing allocations are in this category. There is also more focus on city centre redevelopment through the identification of city centre masterplan projects. Much of the vacant and derelict land in the City is identified as opportunity sites for redevelopment.

568: The Employment Land audit shows that there is 222ha of marketable employment land throughout the City, of which 52ha is immediately available. This does not include individual vacant sites in existing areas. They are spread throughout the City, including Kingswells. We think that a wide range of employment land and sites is already on offer and there is no need to identify more.

477: Having employment land as part of large allocations such as Grandhome and Countesswells is important in ensuring we have mixed use communities. This allows more opportunity for people to live and work in close proximity, thereby reducing travel requirements and carbon emissions. We would not support re-purposing these areas to town centre uses – these places already have such uses appropriate to meet their needs. Allowing more could impact on existing centres, including the city centre.

#### Other Proposals

5, 13: The MIR says that Kingsford is one of a number of proposals that emerged from the development bids, an updated Brownfield Urban Capacity Study and the City Centre Masterplan. It does not say it is brownfield. The proposal was approved for the reasons set out in the Report of Handling which went to Full Council. Councillors were aware of all relevant information and the correct procedures were followed. The next ALDP will reflect this consent by identifying the development as an opportunity site.

480: Agree. The limiting nature of the site, buildings and car parking here will ensure that any proposals will be small scale.

**Planning authority action/recommendation for Proposed Plan**

No recommendations other than to continue to identify suitable brownfield sites in the Proposed Plan.

<b>Issue 5</b>	<b>NHS Grampian Healthcare Facilities</b>
<b>Section of the MIR to which the issue relates:</b>	Section 2.4 NHS Grampian Healthcare Facilities
<b>Planning authority's summary of the comment(s):</b>	
<p><u>General</u></p> <p>18: A more radical, proactive and equalitarian approach is required across the city to upgrade current healthcare facilities.</p> <p>318: Healthcare sites are adequate-the issue lies with staffing.</p> <p>361: Facilities are usually on the periphery, they should be in the centre of the community or the city centre so they are accessible by public transport.</p> <p>390: Any new site should have healthcare provision.</p> <p>422, 456: Content with the sites that have been selected to take forward.</p> <p>543: Respondent is aware of the NHS Forest Programme with aims around using nature to improve societal health and wellbeing. Any new estate proposals should participate in this programme and incorporate high quality green space which can benefit NHS staff, patients and visitors. Any proposed sites should take into account the need to allocate space for green space, woodland creation and development of community space.</p> <p>544: Respondent notes ongoing discussions with the Council about locating a new health facility on the site of the existing Bucksburn Clinic. Respondent notes site is incorrectly designated as green space in the extant ALDP requests site be considered for a healthcare facility.</p> <p>544: Respondent requests bid 12/03 – Former Torry Nursery, Oscar Road be considered for health care use in Proposed ALDP.</p> <p>544, 560: Aberdeen Royal Infirmary is too congested.</p> <p>599: Timely delivery and operation of the Countesswells Medical Facility is vital.</p> <p><u>Dyce and Stoneywood</u></p> <p>544: Note that Cordyce School (B01-11) – NHS bid is withdrawn</p> <p>544: Central Park, Dyce (B01-10) – NHS bid is still valid</p> <p>6: B0110 Site adjacent to New Dyce Medical Centre</p>	

Site may affect sports pitches. We would stress that sportscotland is a statutory consultee in relation to any planning applications which may involve the loss of, or prejudice the use of, outdoor sports facilities. When consulted on any such planning applications, we reply in accordance with Scottish Planning Policy (SPP) paragraph

226. We suggest it is helpful for text relative to any such allocation, to specifically refer to the need to provide compensatory facilities where appropriate.

14: Rebuilt or remodel the existing buildings around the central park in Dyce, by using extensions to the primary school, secondary school and / or GP surgery. The surrounding bus terminus and area could be better landscaped.

448: B01/10 Central Park, Dyce - Serious reservations regarding the proposal due to the loss of public green space.

14: B0111 Cordyce Primary School and 001 Bucksburn Primary School  
No advantage to having new surgeries in these sites

21: B03/11 Cordyce School. Should be a priority. Dyce needs a new health care facility.

448: B01/11 Cordyce School - Cautiously support proposal because the present Dyce health centre is life expired.

625: B01/11 Cordyce School – Notes this is a LNCS and was previously identified as a green corridor and importance in woodland habitat network

633: B01/11 Cordyce School - Respondent advises that where a site (or part of) has known flood risk, must be accompanied by a satisfactory Flood Risk Assessment. The outcome will advise the appropriate level of development. Respondent has identified sites that fall into a Potentially Vulnerable Area (PVA) of the national FRA (2011).

#### Bucksburn and Bankhead

544: note that Bankhead Playing Fields (B01-12) and Former Stoneywood School (002) - NHS bid is withdrawn. Former Bucksburn Primary School (001) – NHS bid is still valid.

14: New health hub should be built at the old Stoneywood Primary School or the old academy field. Both sites have good public transport and would redevelop existing buildings. A chemist, café, travel centre could be included in the development. Reopening access to local roads to connect the site to TECA, new housing developments, airport park and ride and Dyce train station.

14: Keep Gilbert Road/ Inverurie road building for administrative purposes and a smaller surgery could be located in the area. Redevelop areas around doctors surgeries, and the upper floor of the Beacon centre to create a hub of community uses such as swimming pool, physios, gyms, chemist, and a community kitchen all serviced with modified bus routes. Invest in mobile doctors' surgeries. Create a travel hub at the Haudagain to allow quicker bus transport to the hospital.

14: B0111 Cordyce Primary School and 001 Bucksburn Primary School  
No advantage to having new surgeries in these sites

61: Q4 001 Former Bucksburn Primary School

Site was gifted to the people of Bucksburn to be used for the benefit of children.

Access to the site is poor, the unnamed road is not council owned, and is unsuitable for large numbers of vehicles. Redevelop the existing GP surgeries

97: Medical centre is welcomed as Howes Road but traffic impact and the road infrastructure is a concern.

633: 001 Former Bucksburn Primary School - Respondent advises that where a site (or part of) has known flood risk, must be accompanied by a satisfactory Flood Risk Assessment. The outcome will advise the appropriate level of development.

Respondent has identified sites that fall into a Potentially Vulnerable Area (PVA) of the national FRA (2011).

001 Former Bucksburn Primary School - Flood risk identified. Requirement for FRA.

613: Disagrees with statement that Stoneywood School is peripheral to NHS facilities – now has good access and should be reconsidered.

#### Northfield and Mastrick

544: Note that South of Orchard Brae School (B03-17) – NHS bid is withdrawn

544: West of Orchard Brae School (B03-18) – bid is still valid

#### **Summary of response by planning authority:**

##### General

18, 361, 390, 422, 456, 543: Planning covers many aspects of health and wellbeing, including placemaking, active travel, green spaces, noise, air quality and the ageing population. The Local Development Plan team held a workshop on improving health outcomes of the ALDP during its preparations and the outcomes fed into it where feasible. New health facilities are identified in the Proposed ALDP, in consultation with NHS Grampian, and there is a new section and policies on health and wellbeing.

318, 544, 560, 599: These are not issues that the Proposed ALDP can directly address.

544: The Bucksburn Clinic is zoned as part of a larger area of green space that also includes the park, playing fields and school. It's continuation as a clinic is not affected by the zoning. The former Torry Nursery site would be suitable for health care uses. However, it is also suitable for residential use and both these uses would need to be reflected in the opportunity site description.

### Dyce and Stoneywood

All – It should be noted that NHS Grampian have withdrawn their bid for the site at Cordyce (for which views on the proposal were mixed). They favour a location at Central Park in Dyce. This has several advantages over Cordyce – it is more central to the community, it is where the existing medical centre is and there is a cluster of facilities which enables multi-purpose trips to be made. We would however, agree with sportscotland that the artificial pitches would not be a suitable location.

An alternative location south of the shopping centre has therefore been identified. This avoids sports pitches but because it is on a functional area of open space, it is proposed that the existing health centre be turned over to open space as compensation. A further alternative could be to move the practice into the shopping centre (temporarily or permanently) which would allow the redevelopment of the existing medical centre.

### Bucksburn and Bankhead

All - It should be noted that NHS Grampian have withdrawn their bids for Bankhead Playing fields and the former Stoneywood School. Therefore there is little point in examining these options any further. The former Bucksburn Primary Schools is still an option. In terms of access to the site, there is a pre-existing access to the school. It may be possible to improve this through for instance, the introduction of a one way system. The use of the site for the benefit of children is noted, although we would point out that a medical centre is likely to be more useful to the population, including children, than having it stand empty. Having said that the site would also be suitable for residential use should the medical centre not progress. In any event, a Flood risk Assessment will be required.

### Northfield and Mastrick

544: Land west of Orchard Brae School would be suitable for a medical centre and would be part of a hub of neighbourhood facilities for the area.

## **Planning authority action/recommendation for Proposed Plan**

Identify land south of the shopping centre at Dyce for a medical centre (OP24 in the Proposed ALDP).

Identify former Bucksburn Primary School as an OP site for a medical centre or other uses compatible to a residential area. A Flood Risk assessment will be required.

Add the following to the text of OP33 Greenferns: 'A new medical centre will be located on land to the west of Orchard Brae School.'

<b>Issue 6</b>	<b>Undesirable Sites - North</b>
<b>Section of the MIR to which the issue relates:</b>	Section 2 Settlement Strategy
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Dyce</b></p> <p><u>B01/01 Chapel Farm</u></p> <p>95: Supports undesirable designation. Pleased to see oil and gas pipelines have been considered in site assessment.  181: Site should be designated for employment use and the greenbelt designation around the wider Chapel Farm should remain. Respondent queries site's undesirable status when it has scored well in most of the site assessment criteria. Notes it is contradictory for the site to continue to be in use for employment purposes but not formally be allocated as such.</p> <p><u>B01/02 Newhills South</u></p> <p>422: Supports Council's assessment of site and undesirable designation.  514: Objects to undesirable designation. Site is under the control of a housebuilder and has no constraints. It should be zoned for residential use in the first phase of the local development plan. Disagrees with site assessment in relation to natural conservation, landscape features, landscape fit, relationship to existing settlement, accessibility, proximity to facilities, land use conflict and service infrastructure capacity.</p> <p><u>B01/03 Bleachfield House</u></p> <p>614: Supports site for inclusion. Disagrees with checklist score and requests reassessment. Site is well sheltered with good south and west facing aspect. Converting or replacing the building to small scale retail, office and cultural uses would benefit the area. Site is well-related to the Grandhome development. Proposed mixed-uses would contribute to existing uses. Residents would have good access to facilities. No present or future infrastructure concerns. Development would be unobtrusive to landscape. Bus stop is within approximately 380m. Disagrees with comments on flood risk, environment and landscape. Due to low flood risk there will be technical and design solutions to mitigate any concerns. Until recently there was existing built development that neither SEPA nor the Council's flood team objected to. Modest development in a large site which will facilitate control of Japanese knotweed and environmental improvements. Comments that site should be retained as greenbelt ignore that site is brownfield with built development. Access limitations can be solved through technical solutions achieved by the Council's road's officials and planners.</p> <p><u>B01/04 Rowett North</u></p> <p>476: Agrees with undesirable designation for retail allocation.</p>	

530: Objects to undesirable designation. Provides information on the new Aberdeen Exhibition and Conference Centre. Makes observations on site assessment and welcomes overall high scores. Relaxation of current zoning would have no impact on the green space network designation as the site is already allocated for development. The principle of development has been established on site and the TECA building would be the dominant building feature on the site. Site benefits from a strategic position and the proposal would provide uses benefiting professionals and visitors in the area. Relaxation of employment uses on site will support a more diverse and viable development. Proximity to services isn't critical as the proposal is intended to support TECA as part of the wider employment area. Proposal will meet deficiencies highlighted in the 2013 Aberdeen and Aberdeenshire Retail Study.

#### B01/08 Newton Croft, Bucksburn

567: Objects to non-allocation of site. Site has suitable access and is outside noise contour lines. Refutes school capacity concerns and notes this can be offset via developer contributions. Refutes concerns over loss of green belt notes it does not make a valuable contribution to the green belt. Refers to the Reporter's comments on the site in the 2012 Local Development Plan. Contends site checklist scoring.

#### B01/09 Newton Farm

95: Supports undesirable designation. Pleased to see oil and gas pipelines have been considered in site assessment.

515: Objects to failure to identify this partly brownfield site. Planning system should support sustainable economic growth and regeneration and the creation of well-designed sustainable places including the redevelopment of brownfield sites. Site should be zoned for business and industrial uses either for immediate development or as strategic reserve land. General comments are provided in relation to the site assessment with regards to exposure, flood risk, built/cultural elements, natural conservation, landscape features, landscape fit, landscape use mix, proximity to facilities, contamination and land use conflict.

#### B01/16 – Cordyce School

98: Submitted bid should be included in local development plan for a garden centre and nursery.

#### B01/17 – Site 1, Persley Park

632: Requests land is rezoned from greenbelt to housing.

#### B01/18 – Site 2, Cairnfield Place

632: Requests land is rezoned from mixed use to housing.

#### B01/19 – Site 3, Cairnfield Gardens



632: Requests land is rezoned from mixed use to housing.

B01/20 – Site 5, Blacksmiths Croft

632: Requests land is rezoned from mixed use to housing.

B01/21 – Site 6, Blacksmiths Croft

632: Requests land is rezoned from mixed use to housing.

B01/22 – Site 7, Plot adjoining Cairnview Gardens

632: Requests land is rezoned from mixed use to housing.

**Bridge of Don**

Bridge of Don General

23, 25, 28: Bridge of Don is overcapacity in terms of housing, roads, amenities, schools and transport.

28: Bridge of Don has sufficient development.

B02/03 Mundurno

23, 24, 25, 26, 28: Agrees with undesirable designation.

28: Negative impact on wildlife, existing residential amenity and house price.

472, 538: Site is greenbelt and should be protected. It is close to busy B999 with no pedestrian access.

538: Site is in greenfield network. Any increase in traffic will have a detrimental impact on B999.

B02/04 Aberdeen Innovation Park

472: Mature greenfield site. Development should not be permitted.

533: Object to failure to increase flexibility to permit an increased range of uses on site. Object to failure to consider residential use on the Campus One part of the site. To achieve aims of the Main Issues Report policy must encourage development. Notes that despite extensive marketing, 3ha of the site remains undeveloped. Circumstances have changed significantly since the mid-1980s. To compete with other locations and to attract investment, alternative uses supportive of class 4 business use should be encouraged. Requests site includes a range of uses: class 1, class 2, class 3, class 8, class 10 and class 11.

538: Application relates to a greenfield site. Aim of the green belt is to maintain the distinct identity of Aberdeen and the communities within and around city. The application form under the heading 8.1 states that "Consultation will be undertaken as part of the LDP review process", to date no contact has been made with the Community Council. Bridge of Don does not require any additional homes because Grandhome is already allocated.

#### B02/05 Aberdeen Energy Park

472: Part of the application is greenfield. Traffic impact will add pressure to Ellon road and road junctions.

533: Object to failure to increase flexibility to permit an increased range of uses on site. Site should fall under policy zoning B1 – Business and Industrial Land. Site assessment fails to recognise that the range of proposed uses were to be of a scale supporting of and ancillary to the primary business and industrial areas. To achieve aims of the Main Issues Report policy must encourage development. Despite extensive marketing and relaxation on user restrictions it has remained difficult to find occupiers in the current market - three undeveloped sites remain on the Park. Designation of the site under policy B1 would increase the range of acceptable uses. The original concept of the Energy Park is irrelevant and there have been massive changes in the oil and gas sector. Emphasis of economic bodies is on seeking greater diversification of the economy. The Park and expansion area could satisfactorily operate under the terms of Policy B1 to ensure a consistent approach.

538: Part of the site relates to greenfield sites. Aim of the green belt is to maintain the distinct identity of Aberdeen and the communities within and around the city. Loss of greenfield sites is a concern. The application form under the heading 8.1 states that "Consultation will be undertaken as part of the LDP review process", to date no contact has been made with the Community Council.

#### B02/06 AECC Bridge of Don Recycling Centre

472: There is the need for a new facility in Bridge of Don. Traffic and access issues would need to be resolved.

538: Recognises the importance of relocating the existing Recycling Centre to a safer and larger site. Traffic management arrangements would need to be robust in order to provide safe and easy access/egress from the site onto the Ellon Road.

#### B02/09 West Dubford

23, 24, 25, 26, 28: Agrees with undesirable designation.

28: Negative impact on wildlife, existing residential amenity and house price.

472: Site is greenbelt and should be protected. Site is predominantly gorse/shrubbery and is used by species.

527: Supports allocation of the site.

529: Allocate site for long-term residential development in the period beyond 2032. Disagree with officer's conclusions in the site assessment. Observations are made in relation to the site assessment. Notes site could be developed in a way to maximise south facing aspects. Site is of limited natural conservation value. Refers to submitted environmental appraisal report and indicative plan submitted with the bid.

538: Additional housing will add to existing traffic problems. Refers to development of 550 homes in Dubford with little done to improve the environment and infrastructure. Site is located within the greenbelt and greenfield network designation and should not be developed. Queries bid statement that there would be no loss or disturbance of wildlife habitats or species. Concerned about lack of safe pedestrian footpaths to schools and distance to the nearest school. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

#### B02/10 Mundurno

23, 24, 25, 26, 28, 422, 476: Agrees with undesirable designation.

28: Negative impact on wildlife, existing residential amenity and house price.

472: Road infrastructure would be unable to cope with additional traffic. Lack of public transport. Impact on school and medical services capacity.

525: Objects to failure to identify site for residential-led mixed use development. Site should be preferred for phased development in the first Plan period. Development provides opportunity to enhance gateway experience along the A90, reinforce structural landscape of north Bridge of Don and extend the green network. AWPR has changed the area's character and justifies a green belt boundary review. AWPR will provide a long-term defensible boundary. Development sites in the south are nearing completion which provides numerical justification to site allocation. Site's development would have less impact than on other greenfield sites. Around 22.5ha would be open space. There will be flexibility in overall housing numbers to justify level of services. References submitted masterplan. Queries site assessment scoring for landscape fit and proximity to facilities. Notes Reporter's conclusions on the extant plan did not rule out future development of the site.

527: Supports allocation of the site.

538: B999 would be unable to cope with volume of additional traffic. Concerned about lack of safe pedestrian footpaths to schools and distance to the nearest school. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope. Refers to ongoing Dubford development. Distinct lack of public transport.

#### B02/11 Newton of Mundurno

25, 26, 28, 422, 476: Agrees with undesirable designation.

28: Negative impact on wildlife, existing residential amenity and house price.

472: Road infrastructure would be unable to cope with additional traffic. Lack of public transport. Impact on school and medical services capacity.

525: Objects to failure to identify site for residential-led mixed use development. Site should be preferred for phased development in the first Plan period. AWPR has changed the area's character and justifies a green belt boundary review. Coalescence with Potterton is not going to be an issue as development will maintain a 1km separation. References submitted masterplan. Creation of new landscape structure will improve environmental quality and enhance biodiversity. Queries site assessment. Proposed primary school will address education capacity issues.

538: B999 would be unable to cope with volume of additional traffic. Concerned about lack of safe pedestrian footpaths to schools and distance to the nearest school. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope. Refers to ongoing Dubford development. Distinct lack of public transport. Concerned plans show housing right up to the border of the Hill of Tramaud landfill site. Notes set distances for any new development from a landfill site.

#### B02/12 Former AECC

472: Road infrastructure would not cope with additional traffic. Negative Impact on existing housing. Concerned about safety of children crossing the road to and from school.

476: Agrees with undesirable designation for retail allocation.

538: Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope. Development would have an impact on the existing traffic network and is located near to a built-up housing area.

#### B02/13 Shielhill North & South

23, 24, 25, 26, 28, 422: Agrees with undesirable designation.

28: Negative impact on wildlife, existing residential amenity and house price.

472, 538: Site is greenbelt, 472: and greenfield, and should be protected. Road infrastructure would be unable to cope with additional traffic.

527: Contests conclusions that site is undesirable. Promotes site for mixed use residential development in the period beyond 2032. Disagrees with conclusion set out in site assessment. Site is close to Dubford which includes retail units and play areas, and Scotstown Moor Local Nature Reserve. Green space network designation is less than 11% of the site area and it passes through sites OP2 and OP25 which demonstrates that development can be accommodated. Refers to initial bid submission. Queries site assessment scoring of 1 and 2. Site assessment ignores that part of the site is brownfield land – it does not contribute to green space buffer between Bridge of Don and Potterton. AWPR is a more robust boundary. Green belt boundary should be reviewed. Refers to Scottish Planning Policy and The Strategic Development Plan in relation to brownfield land.

Development would be a natural extension to previous approved planning applications on southern part of site. Refers to Council's preference of B02/08 WTR Site and notes allocation of this site would help improve the residential character of the area. This site, together with B02/08 WTR Site and B02/10 Mundurno present a sustainable direction of future growth. It would provide necessary critical mass of housing to address infrastructural capacity issues and provide commercial viability of the proposed commercial centre.

538: Concerned about lack of safe pedestrian footpaths to schools and distance to the nearest school. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

#### B02/14 Shielhill South

23, 24, 25, 26, 28, 422: Agrees with undesirable designation.

28: Negative impact on wildlife, existing residential amenity and house price.

472, 538: Site is greenbelt, 472: and greenfield, and should be protected. Road infrastructure would be unable to cope with additional traffic.

527: Contests conclusions that site is undesirable. Promotes site for mixed use development with a revised site boundary. Site should be favoured for development because it is on brownfield land and scores 3 in several factors in the site assessment. Queries site assessment scores of 1 and 2. Site contributes little to the green belt and should be re-allocated. Queries flood risk score and refers to lack of objection from Flooding team in Dubford development. Much of the green space network comprises amenity grounds throughout the industrial estate and some housing and it passes through sites OP2 and OP25. Development will enhance limited vegetation on site. Refers to initial bid submission. Queries site assessment scoring of 1 and 2. Refers to Scottish Planning Policy and The Strategic Development Plan in relation to brownfield land. Development would be a natural extension to residential development to the south. Refers to Council's preference of B02/08 WTR Site and notes allocation of this site would help improve the residential character of the area. Both developments would provide necessary critical mass of housing to provide commercial viability of the proposed commercial centre in bid B02/13 Sheilhill North and South. Notes housebuilder's track record.

538: Concerned about lack of safe pedestrian footpaths to schools and distance to the nearest school. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

#### B02/15 Berryhill Farm (1)

472: Access / egress to A90 will add to traffic congestion and poor air quality. There are no regular public transport options. Existing infrastructure is already struggling.

538: Objects to development. Bridge of Don is struggling with existing infrastructure due to continual housing developments. Development would have a negative impact on traffic. Concerned about negative impact on traffic if residential development bids adjacent to the

site and to the north were approved. Nearest public transport location is by out of town services. Site should remain for employment use. Respondent notes that the number of vacant industrial units will change in like with the increasing oil prices. Concerned about distance to the nearest school and lack of safe pedestrian footpaths to schools.

559: Rezone to residential use to address current over-supply of employment land. The Council has not afforded the provision of effective supply of new homes. Notes 2016 Housing Land Audit and Brownfield Urban Capacity Study. Concerned brownfield sites are non-effective. Refers to Scottish Planning Policy on site allocation and delivery of development. Contends site assessment and provides alternative scoring. Notes housing numbers are not included as a main issue within the Main Issues Report. Attached Berryhill Farm Indicative Framework Analysis.

#### B02/16 Berryhill Farm (2)

472: Access/egress to A90 will add to traffic congestion and poor air quality. There are no regular public transport options. Existing infrastructure is already struggling.

538: Objects to development. Bridge of Don is struggling with existing infrastructure due to continual housing developments. Development would have a negative impact on traffic. Concerned about negative impact on traffic if residential development bids adjacent to the site and to the north were approved. Nearest public transport location is by out of town services. Site should remain for employment use. Respondent notes that the number of vacant industrial units will change in like with the increasing oil prices. Concerned about distance to the nearest school and lack of safe pedestrian footpaths to schools.

559: Rezone to residential use to address current over-supply of employment land. The Council has not afforded the provision of effective supply of new homes. Notes 2016 Housing Land Audit and Brownfield Urban Capacity Study. Concerned brownfield sites are non-effective. Refers to Scottish Planning Policy on site allocation and delivery of development. Contends site assessment and provides alternative scoring. Notes housing numbers are not included as a main issue within the Main Issues Report. Attached Berryhill Farm Indicative Framework Analysis.

#### B02/17 Berryhill Farm (3)

422: Supports Council's assessment of site and undesirable designation.

472: Access / egress to A90 will add to traffic congestion and poor air quality. There are no regular public transport options. Existing infrastructure is already struggling.

538: Objects to development. Bridge of Don is struggling with existing infrastructure due to continual housing developments. Development would have a negative impact on traffic. Concerned about negative impact on traffic if residential development bids adjacent to the site and to the north were approved. Nearest public transport location is by out of town services. Site should remain for employment use. Respondent notes that the number of vacant industrial units will change in like with the increasing oil prices. Concerned about distance to the nearest school and lack of safe pedestrian footpaths to schools.

559: Rezone to residential use to address current over-supply of employment land. The Council has not afforded the provision of effective supply of new homes. Notes 2016 Housing Land Audit and Brownfield Urban Capacity Study. Concerned brownfield sites are non-effective. Refers to Scottish Planning Policy on site allocation and delivery of development. Contends site assessment and provides alternative scoring. Notes housing numbers are not included as a main issue within the Main Issues Report. Attached Berryhill Farm Indicative Framework Analysis.

#### B02/18 Causewayend

472, 538: Site is greenbelt and greenfield and should be protected.

538: Development should be blocked because Grandhome development is underway. Concerned about traffic increase on B999. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

583: Site should be allocated for approximately 280 homes. Deliverable site, an extension to existing urban area with good access and associated community facilities. Site is immediately effective. It is located next to existing and new infrastructure, and existing settlement patterns. Refers to paragraph 50 of Scottish Planning Policy in relation to rezoning greenbelt land for development. Each bid should be considered against planning related criteria including an upto date Greenbelt Review. SNH's Ancient Woodland Inventory does not identify this area as 'ancient' but as 'long established (of plantation origin). Proposal will aim to retain existing woodland. Development will be designed to have least possible impact on setting. SNH's Landscape Character Assessment indicates site is within Undulating Wooded Farmland character area. Impact on landscape is not as serious as suggested in the MIR. Agrees with scoring for distance to local facilities. Reviews site assessment scoring.

#### B02/19 Perwinnes

422: Supports Council's assessment of site and undesirable designation.

472, 538: Site is greenbelt and greenfield and should be protected. Increase in traffic will have a detrimental impact on an already busy road.

538: Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

583: Site should be identified as Strategic Reserve for mixed-use development of 3,000-4,000 homes, employment, retail and community uses. Relatively constraint free in single ownership. Radar operator confirmed that is not a serious constraint. Development will adopt all Scottish Planning Policy principles to deliver best quality. Refers to paragraph 50 of Scottish Planning Policy. in relation to rezoning greenbelt land for development. Each bid should be considered against planning related criteria including an upto date Greenbelt Review. Site is outside of Green Space Network showing it is less sensitive than other parts of the city. Cultivated fields to south and northeast are actively farmed and should not be considered Green Space Network. This is a large development with opportunity to increase

accessibility and improve access by sustainable transport and provide connections to existing settlements. Disagrees that development would result in urban sprawl. Impact on landscape is not as serious as suggested in MIR. Refers to SNH's Landscape Character Assessment of Undulating Woodland Farmland (to south and west) and Undulating Open Farmland (to east). Reviews site assessment scoring.

#### B02/20 Cloverhill

292, 293, 532, 603, 604, 607: Supports development – new housing and mix of uses welcomed.

472: Access/egress to A90 will add to traffic congestion and poor air quality. Concerned about children crossing busy roads. Site is zoned for industrial/business use and is part of the Energetica corridor.

532: Proposed junction and reduced speed limit will have community benefits. Over-abundance of business land is a disincentive to business users. Homes are urgently required and will be a positive stimulant to the commercial prospects of the area.

534: Supports proposed residential development to meet housing shortage and facilities in Bridge of Don. Available development sites are being built at a very slow pace. Proposed development has facilities with community benefits.

538: Objects to development. Bridge of Don is struggling with existing infrastructure due to continual housing developments. Development would have a negative impact on traffic. Nearest public transport location is by out of town services. Consideration should be given to additional traffic on the Parkway from development at Grandhome, Persley Den and Mugiemoos. Respondent notes inconsistency and queries how Donmouth, a historic 80-year old development must have its access routes limited yet this new development can be considered. Site should remain for employment use. Respondent notes that the number of vacant industrial units will change in like with the increasing oil prices. Concerned about distance to the nearest school and lack of safe pedestrian footpaths to schools.

585, 586, 587, 588, 589, 590, 601, 602: Supports development to provide a choice of homes. Will retain young people and families in Bridge of Don. New junction and lower speed limit will improve access. Community facilities will benefit wider population.

586: There is sufficient business land available.

587: The AWPR and Third Don Crossing have removed traffic from the roads. Housing would be off a key access route with established bus routes. It will be a more pleasant environment for existing residential units within Cloverhill.

589: Needs to be a guarantee these things will be delivered.

590: Access to Ellon and the AWPR is good, and for travelling into the City Centre.



595: Site should be allocated for 500 – 600 residential units, employment and community uses. Council recommendation is at odds with the Energetica Corridor aspirations. Proposal has been modified – removal of Class 4 employment use on Ellon Road frontage and community recycling centre has also been removed. There is overprovision of employment land. Rezoning site would not impact on marketable supply of employment land. Site complies with Strategic Development Plan requirements and is not an extension to existing masterplans. Lack of housing delivery is an issue. Site is in a sustainable location with access to transport networks and local services. Landscape and Visual Assessment, and a Flood Risk Assessment have been carried out. Concerned at suggestion that house-led mixed use proposal would have a greater landscape impact than the present allocation. There is a small residential population within and around the site that will be consolidated with the development area. Recent AECC consent for housing sets a precedent for establishing housing adjacent to employment uses. Transport Assessment is being prepared. Development could enhance bus, active travel and connectivity between residential neighbourhoods. Refers to existing mix of uses in Aberdeen Energy Park. Noise Assessment has been carried out. Existing conflict in place between employment uses and homes on land to the east. Discussions with the Council have taken place regarding provision of education infrastructure. Supporting technical reports for the upcoming planning application will address potential negative environmental impacts of the development noted in the SEA. 604: Development will bring benefits for the Bridge of Don Thistle Junior Football Club and social benefits for youths.

#### B02/21 Balgownie Area 2

472, 538: Site is greenbelt and greenfield and should be protected.

512: Disagrees with undesirable recommendation. Disagrees site is used for recreation – pitches are surplus to requirements and their use is under review. Development will have opportunities to protect and enhance wildlife; funds from the development will be used to enhance the remaining site area for community uses. Development would enable retention and improvement of recreational facilities in Area 1. Reference is made to representations submitted for B02/04 Aberdeen Innovation Park.

#### B02/23 Balgownie

472, 538: Site is greenbelt and greenfield and should be protected. It is close to Grandhome and will impact on local infrastructure and services. It will add to traffic and air quality issues.

512: Disagrees with undesirable recommendation. Urban green space and green space network designations should be removed from all but Area 1 of the site. Bid should be identified for residential development. Approximately 7.1ha of site will be retained as open space. Disputes site assessment in terms of use and quality of the recreational facility. Disagrees site is used for recreation – pitches are surplus to requirements and their use is under review. Development will have opportunities to protect and enhance wildlife; funds from the development will be used to enhance the remaining site area for community uses. General observations are made in relation to the site assessment.

### B02/24 Balgownie Area 3

512: Disagrees with undesirable recommendation. Although site lies within the green space network and urban green space, around 7.1ha will be retained as open space. Disagrees site is used for recreation – pitches are surplus to requirements and their use is under review. Allocation would enable enhancement of public access. Queries site assessment scoring in relation to landscape features, landscape fit and land use conflict. Site development would enable retention and improvement of recreational facilities within Area 1 and allow their use by the community. Reference is made to representations submitted for B02/23 Balgownie.

538: Site is greenbelt and greenfield and should be protected. Concerns of traffic flow, road safety and air quality. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

### B02/26 Balgownie Area 5

472, 538: Site is greenbelt and greenfield and should be protected. It is close to Grandhome and will impact on local infrastructure and services. It will add to traffic and air quality issues.

512: Disagrees with undesirable recommendation. Although site lies within the green space network and urban green space, large part of adjacent site to the south will be retained as open space. Disagrees site is used for recreation – pitches are surplus to requirements and their use is under review. Development will have opportunities to protect and enhance wildlife; funds from the development will be used to enhance the remaining 7.1ha southeast of the site for community uses. Reference is made to representations submitted for B02/23 Balgownie.

538: Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

### B02/27 North of Balgownie

472, 538: Site is greenbelt and greenfield and should be protected. It is close to Grandhome and will impact on local infrastructure and services. It will add to traffic and air quality issues.

512: Disagrees with undesirable recommendation. Site is suitable for residential development and complies with Council's strategy to identify small greenfield housing sites. There will be minimal impact on green space network. Disagrees site is used for recreation. Site has no significant wildlife or heritage value. Funds from the development will be used to enhance sporting facilities south of the site for community uses. Reference is made to 2017 Local Development Plan Examination which concluded site has no landscape value. Reference is made to representations submitted for B02/25 Balgownie Area 4 where the Council concluded the land has no landscape value. General observations are made in relation to the site assessment.

538: Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

#### B02/28 Land West of Balgownie Road

472, 538: Site is greenbelt and greenfield and should be protected.

538: Concerns of traffic flow, road safety and air quality. Given the large number of bids for residential development received in Bridge of Don, the school system would be unable to cope.

#### B02/30 Land at Corse Hill

60: Site should be included in the local development plan for up to 120 houses. Landowner is content if 80 houses are promoted.

#### B02/31 Balgownie Area 2 Residential

512: Promotes site for 80 residential units. An indicative Masterplan is shown. Education capacity is available. Current use of the site is low, and it is unavailable to the public. Large part of wider site will be retained as open space. Development will have opportunities to protect and enhance wildlife; funds from the development will be used to upgrade sports facilities within Area 1 and 7.1ha of land to the north of Area 2.

#### B02/32 Silverburn House

517: Promotes site for 100 houses. Notes support from Scottish Government of further housing provision. References paragraph 103 in Scottish Planning Policy and development of brownfield sites. Site is underused and due to significant changes to the employment land market it should be re-allocated. Reference is made to Strategic Development Plan. Main Issues Report has not addressed surplus employment land allowance. Comments provided relating to site assessment. Note on housing demand and masterplan is attached.

517: The Council do not propose to allocate this site for residential development on the grounds set out in the Development Options Assessment Report. The site is allocated for employment uses and Scottish Planning Policy requires local development plans to protect employment land. Allocation of this site would erode the specialist nature of the employment area. The Bridge of Don area already comprises numerous allocations due to be completed. There is therefore no need to allocate any further housing land in this area.

#### B02/33 Shielhill South

527: Recommends site for mixed-use development. Refers to submitted masterplan. Refers to Scottish Planning Policy and the Strategic Development Plan requirements on brownfield land development. Refers to Scottish Planning Policy and the Strategic Development Plan in relation to brownfield land. Development would be a natural extension to residential development to the south. Refers to Council's preference of B02/08 WTR Site and notes allocation of this site would help improve the residential character of the area. Both developments would provide necessary critical mass of housing to provide commercial viability of the proposed commercial centre in bid B02/13 Sheilhill North and South. Notes housebuilder's track record.

### B02/34 WTR Site Extension

529: Requests allocation of site for housing development of around 38 units. There may not be sufficient requirement for additional housing land in the Bridge of Don area to justify allocation of bid site B02/09 – West Dubford however there would be merit in allocating this site. Reference is made to Scottish Planning Policy and The Proposed Strategic Development Plan's principles on the reuse of brownfield land. Masterplan is attached. Site has all the benefits associates with preferred bis B02/08 – WTR Site with further benefits of delivering new housing in a sustainable and suitable location. General observations are made in relation site assessment criteria.

### B02/35 Campus One, Aberdeen Innovation Park

537: Campus One has majority of undeveloped land at Aberdeen Innovation Park and has lack of interest for business use. Site should be identified for approximately 40 residential units with a range of affordable. This would assist with the regeneration of the Park and cross-fund the development of small-scale business units on the vacant plot to the east. Requests the submission made in relation to Campus 1 be considered in the context of submissions made to adjoining land at Balgownie Playing Fields. Refers to brownfield land principles noted in paragraph 103 of Scottish Planning Policy. Existing businesses within the Park are well established and the reallocation of the land to the south west for residential purposes would not prejudice their continued operation. Refers to submitted site layout.

## **Kingswells**

### B03/02 Gillahill

15, 37, 138: Agrees with undesirable designation.

15: Access to school will be dangerous. Land should remain greenbelt.

37: Site is on a steep slope, overlooks the village and road access would be hazardous.

138: Site is a green lung of the countryside. There were over 500 objections to its development in previous local development plan. Site contains historical features. Development would be largely car dependent and have landscape impacts.

582: Objects to undesirable designation. Site should be allocated for a mix of uses, including up to 650 homes, a replacement primary school, civic space and cafe. Historically site was earmarked for development in the 1991 Local Plan, Aberdeen City Local Plan 1999 and Aberdeen Local Plan 2004 for residential development, therefore principle of development is acceptable. Refers to a Phase 1 Habitat Survey from 2005 showing no priority habitats on site although there is a varied habitat structure. Separation will be maintained between the site and urban edges of Aberdeen. Landscape features will be incorporated into site layout and design. Development will not encroach into countryside. Refers to submitted OPEN assessment. Proposed development will facilitate a bus route through the site. Development would add to mix of uses. Council fails to acknowledge the proposal includes a primary

school which could alleviate future education capacity issues. Notes capacity at Countesswells Academy and Bucksburn Academy which is due to have an extension.

#### B03/03 Sunnyfield

32: Disagrees with undesirable designation. Site should be in local development plan. It Supports sustainable transport. Queries officer's site assessment in relation to exposure, slope, land use mix, landscape features, landscape fit and service infrastructure capacity.

138: Agrees site is undesirable. Development will have negative impact on landscape, will increase traffic and discourage bus users.

#### B03/04 Land at Woodend Hospital

507, 509, 584: Concerned with loss of amenity space and erosion of surrounding green space. Development will contradict policies H1, D1, D2, NE1, NE5, NE6 and NE9. It will have a detrimental imbalance on the immediate infrastructure. No existing access to site. New vehicular access will increase road traffic. Concerned about noise and traffic disruption to residents during construction. Respondent queries community benefits of the care home and presumes the Council have plans on the required number and location of future care homes. Concerned about state of the amenity area and notes that residents and a local councillor are pursuing the matter.

510: Status of land should remain unchanged. Concerned about the following: loss of amenity space, reduced quality of life due to loss of green space, increased risk to children playing in area due to increased traffic and access down a hill via a blind corner, and interruption of channel used by wildlife for access to and from green space.

523: Concerned about loss of amenity space, reduced quality of life due to loss of green space and increased public and residents' personal safety risk arising from increase in road traffic and access via blind corner.

526: Contest conclusions that site is undesirable. References bid submission and Scottish Planning Policy's requirement to deliver appropriate housing and allocate sites for specialist housing needs. Main Issues Report recognises the need to provide housing for older people. Notes site assessment conclusions. General observations are made in relation to nature conservation, landscape features and slope. Reference is made to the environmental survey. Site makes no contribution to green space network and notes other developments have been approved within close proximity of the Burn. Trees with tree preservation order have limited amenity and nature conservation value. Respondent compares site to allocated OP36 in the local development plan and bid B03/19 Woodend Hospital which is a preferred option.

621: Undesirable site. Potential loss of amenity space, green space and road safety through increased traffic.

#### B03/05 Gateside Farm

138: Agrees site is undesirable. It is an extension of Maidencraig and will curtail the Den Burn's function as a wildlife corridor. Unclear access arrangement.

580: Objects to undesirable designation. Site should be allocated for 40 homes including 10 (25%) affordable flats. It is the remaining small corner of a larger allocation for mixed use development, it is readily deliverable, is free from flood risk and is an attractive gap site.

#### B03/06 Huxterstone

138: Agrees site is undesirable. Development will encroach onto greenbelt and have negative impact on landscape. It will be car-dependent and will discourage bus users. Road layout implies future development along Den Burn valley.

582: Objects to undesirable designation. Site should be allocated for 90 houses. Kingswells Community Council have stated that this site along with one other 'are the only suitable sites for consideration'. This development would therefore fit the Community Council's aspirations for development. Site was designated in the finalised 2004 Local Plan as Future New Community for 450 houses post 2010, therefore principle of development is acceptable. Flood risks associated with site would be fully investigated through the planning process. Site to the west has low ecological value – this is expected to be the same for this site. Surveys for protected species will be carried out. Development will recognise Green Space Network and Rubislaw Local Nature Conservation Site. Previous Green Space Network designation on site has been removed showing this is not a valuable site in terms of conservation. Given extensive development within Aberdeen all falling within the River Dee catchment area, this is not an impediment to any further development on site. Landscape setting will be protected. Refers to 2009 masterplan and submitted OPEN Masterplan. Proposal includes provision of a 15m woodland boundary to contain development. Site forms a natural and logical location for additional housing. Furthest facilities are 15-minute walk from site and there are bus stops within 400m. Notes capacity at Countesswells Academy and Bucksburn Academy which is due to have an extension.

#### B03/07 Land adjacent to Ardene House

101: Contests conclusion that it is undesirable. Site should be promoted for Class 3 (food and drink) and drive-thru facilities. Regard should be given to Planning Development Management Committee's decision on planning application 181336/DPP for the erection of three Class 3 units (including drive-thru facilities) which relates to this bid. The Committee expressed willingness to approve the application. Site assessment should be amended to reflect the planning application. There is no longer a demand for the site to be developed for employment and its reallocation will complement existing and future uses at Prime Four and the new Kingsford Stadium.

#### B03/09 Derbeth, Kingswells

35: Agrees with undesirable status. Development will lead to flooding, increased traffic and detrimental impact on the environment and wildlife.

95: Supports undesirable designation. Please to see oil and gas pipelines have been considered in site assessment.

138: Agrees site is undesirable. Proposal exceeds expectations of the strategic development plan. Building homes next to trunk road has attendant traffic and noise problems and air pollution. Site is unconnected to Kingswells.

565: Supports inclusion of site for development of approximately 700 homes, open space and mix of uses including primary school. Site does not have immediate constraints. Kingswells housing allocation may be delivered by 2020, therefore further development should be identified. Green belt land could be rezoned for housing. Provides critical analysis of site assessment checklist. Development would provide community benefits and housing need; it would be a good landscape fit within Kingswells, provide core paths, access to open space and have minimal impact on built heritage. Education capacity would be addressed.

#### B03/10 Prime West

138: Agrees site is undesirable. Agrees with objections Kingswells Community Council submitted to retail development on site. Main problems are increased traffic, pedestrian safety and competition with city centre retail.

476: Agrees with undesirable designation for retail allocation.

583: Site should be identified in the local development plan. Rezone land for 1,400sqm of convenience retail and 13,900sm comparison retail. Site is in a sustainable location with active travel and public options and significant road infrastructure. Site should be assessed on the need for development and its appropriateness rather than on existing policy. Part of OP29 has approval for 3no food and drink units, deemed compliant with Policy B2. These principles could be applied to the development proposal. There is an excess of employment land supply. Refers to Proposed Strategic Development Plan employment land requirement. Proposal promotes a greater mix of uses – it will have minimal impact on overall employment land supply but will help widen attraction of Prime four and support future business use. Objectives set out in the OP29 Development Framework would be integrated into the retail development. Proposal would have an additional bus stop and given potential increase in footfall it could result in improved transport connections. Bid is smaller than previous proposal subject to planning application (161429/PPP). Retail Statement notes that proposal would have an insignificant 5.5% impact on the city centre. Landscape and Visual assessment from a previous application noted the site is allocated and is adjacent to a Business Park which has changed the area's character. Updated retail statement submitted relating to Hargest Planning Review of previous planning application – reduced scale of retail would have no adverse impact on the city centre, deficiency in retail provision to the west of the city. Any removed trees would be replaced. Connectivity of green spaces would be retained. Reviews site assessment scoring.

596: Agree with un undesirable designation. Large retail development would be contrary to the town centre first principle and may have unacceptable impacts on existing retail and commercial centres.

#### B03/11 Prime Four North

138: Agrees site is undesirable. Site is low-lying and would have less impact on the landscape than B0309 Derbeth. Dyke would be obscured from view when travelling southwards on the C89. Development would break C89 greenbelt boundary and is unconnected to the rest of Kingswells. An additional junction will be required. Pedestrian link to Kingswells Centre shown on plans will result in the loss of trees.

583: Site should be allocated for residential development. It is immediately effective. Located next to existing and new infrastructure and existing settlement pattern. Landscape impact is not significant. Minimal views from site. Proposal does not extend development further north than OP63 and there is substantial landscape buffer north of the site. Refers to paragraph 50 of Scottish Planning Policy. Bid should be considered against planning-related criteria including an up to date Greenbelt Review. Role of C89C has changed since the opening of the AWPR. Proposal includes parkland to maintain setting of the consumption dyke and provide open space. Development will have no impact on greenbelt. Notes safe route has been considered by transport consultants. Notes site's proximity to core paths. Woodland Strategy can be developed for site to set a standoff distance from the boundary of the Nature Conservation site. Small-scale site with minimal impact on primary school role. New Countesswells Academy will relieve pressure on secondary school provision. Site was partially identified as Future New Communities in the 2004 finalised Local Plan. Reviews site assessment scoring.

#### B03/12 East Kingsford

95: Supports undesirable designation. Pleased to see oil and gas pipelines have been considered in site assessment.

138: Supports undesirable designation. Development will erode greenbelt, add congestion and encourage pedestrians to use narrow walkway along A944.

583: Site should be identified in the local development plan as a deliverable small-scale roadside fuel and drive-thru food/drink development close to the A944 and the AWPR. Traffic will not be an issue given this proposal is smaller than the recently approved planning application for three food and drink units on A944. That application's Transport Appraisal was found to be robust by the Council. Site is more accessible for fuelling than the existing nearby fuel station. 5-Mile Garage may form part of a future phase of Prime Four. Site should be removed from greenbelt as it forms part of a small industrial area. Refers to paragraph 50 of Scottish Planning Policy. Bid should be considered against planning-related criteria including an up to date Greenbelt Review. Reviews site assessment scoring.

#### B03/14 Maidenraig North West 1

37: Agrees with undesirable designation.

138: Agrees site is undesirable. Development will erode greenbelt and negatively impact on core paths and landscape. It will increase traffic and discourage bus users.



476: Agrees with undesirable designation for retail allocation.

540: Objects to non-allocation of site. Land is a logical expansion of the existing Maidencraig development. There would be scope to accelerate the development to complete the entirety of the site within the plan period. Refers to the Reporter's support of the site in his report of the 2008 Local Plan Inquiry and the submitted landscape and visual impact assessment which was also supported by the Reporter. Subsequently the Dobbies Garden Centre has been built but the significant area of land below the 145m contour, to the west and north of the garden centre is suitable for development to support the wider masterplan area. Land should be allocated for the development of around 100 houses and commercial retail use, or for around 200 houses.

#### B03/15 Maidencraig North West 2

37: Agrees with undesirable designation.

138: Agrees site is undesirable. Development will erode greenbelt and negatively impact on core paths and landscape. It will increase traffic and discourage bus users.

540: Objects to non-allocation of site. Land is a logical expansion of the existing Maidencraig development. There would be scope to accelerate the development to complete the entirety of the site within the plan period. Refers to the Reporter's support of the site in his report of the 2008 Local Plan Inquiry and the submitted landscape and visual impact assessment which was also supported by the Reporter. Subsequently the Dobbies Garden Centre has been built but the significant area of land below the 145m contour, to the west and north of the garden centre is suitable for development to support the wider masterplan area. Land should be allocated for the development of around 100 houses and commercial retail use, or for around 200 houses.

#### B03/16 Smiddybrae

95: Supports undesirable designation. Please to see oil and gas pipelines have been considered in site assessment.

476: Agrees with undesirable designation for retail allocation.

605: Supports development of site. Complete development of brownfield site is required after substantial fire has left the buildings derelict. Open site is advantageous for commercial development as it increases business viability. Site does not contribute to landscape setting of the city. Its rezoning would not harm the form and function of the green belt. Policy NE2 will prevent the redevelopment most appropriate to the site. Current derelict state of buildings does not fit well into landscape. A944 landscape is becoming increasingly populated with commercial premises. Refers to recent approval for drive-thru facilities (Ref 1813666/DPP). Proposed development is in keeping with the changing landscape. This brownfield site is suitable as employment land.

### B03/21 Huxterstone

37: Agrees with undesirable designation.

138: Agrees site is undesirable. Development will damage Kingswells landscape character. It will negatively impact on core paths and erode the greenbelt. It will increase traffic and discourage bus users.

### **Northfield**

#### B04/04 Northfield Medical Practice

544: Supports strategy to encourage brownfield development within the city. Notes the site is not in the list of preferred sites and welcomes further discussion with the Council to learn the reasons why, and the potential of these being added into the local development plan. Believes this is a valid bid site.

#### B04/05 Haudagain Triangle Rezoning

564: Middlefield is a priority area for Aberdeen City Council and Community Planning Aberdeen for neighbourhood regeneration. Suggests alternate re-zoning for a mix of residential, retail, commercial and community uses to support regeneration of the area.

### **Tillydrone/Seaton/Old Aberdeen**

#### B06/02 Land at Lord Hays Grove (Ph 2)

422: Supports Council's assessment of site and undesirable designation.

592: Site should be allocated for 55-95 housing units with a small retail or commercial facility. It fits within the parameters of being small scale, will have limited impacts on environment and infrastructure and is not an extension to existing sites. Existing woodland will be retained with additional buffer to allow expansion. Site is not a significant gateway into Aberdeen given the woodland screening. Site has been penalised for having landscape features as compared to B06/01 – 152 Don Street which has none. Site can be developed independently and is not an extension. Site is able to deliver an additional retail/community facility. Development will not compromise public space provision. Links to core path will be maintained. Disagrees with site assessment scoring on access and education capacity when compared to preferred site on Don Street.

### **Midsocket/Rosemount**

#### B07/01 Land adjacent to Cornhill Road

422: Supports Council's assessment of site and undesirable designation.

544: Supports strategy to encourage brownfield development within the city. Notes the site is not in the list of preferred sites and welcomes further discussion with the Council to learn the

reasons why, and the potential of these being added into the local development plan. Believes this is a valid bid site.

### **Summary of response by planning authority:**

#### **Dyce**

##### B01/01 Chapel Farm

95: Support for undesirable designation of the site is noted and welcomed.

181: Although this site scored generally well in the Bid Assessment, the continued use of this site for business and industrial purposes is considered acceptable under the Green Belt policy. We do not feel that it is necessary to amend the zoning to reflect existing employment uses. This site forms part of a wider Greenbelt designation and it would be inappropriate to rezone a small section based on a historical use which is not hampered by the existing Green belt zoning.

##### B01/02 Newhills South

422: Support noted.

514: Development on this site would result in the loss of a significant number of trees and disruption to ancient woodland. The site assessment has been reviewed as appropriate. Whilst the Council recognises that new facilities may be provided in the future as part of the wider Newhills development, at present the site would be distant and isolated from the closest settlements in Hopetoun and the wider Newhills area.

##### B01/03 Bleachfield House

614: The Council recognises that there was existing development on the site. Future proposals would be subject to consultation with the Council's Flooding team and if necessary SEPA. Whilst use of the site for small scale retail, employment or cultural uses would benefit the area, such a development is unlikely to be viable. The proposed uses are also likely to generate a considerable amount of traffic in the wider area given the existing access constraints.

##### B01/04 Rowett North

476: Support noted.

530: The Council agree that the principle of development has already been established on site and that TECA is the dominant building in a strategic location. The current allocation allows for uses that support and are compatible with TECA, such as offices, leisure uses, and food and drink uses. Retail use would therefore not be suitable for this site. The 2019 Aberdeen City and Aberdeenshire Retail Study notes the need for retail to serve Newhills expansion, however, this is already allocated in Rowett South (OP21). Relaxation of the

existing zoning would be inappropriate given the allocation of OP21 which would offer retail provision to the Newhills area in the future.

#### B01/08 Newton Croft, Bucksburn

567: The site has been previously assessed and Reporters concluded that it contributes to the green belt objective separating it from Auchmill Golf Course. The Council feels that the site still contributes to the landscape setting of Aberdeen. Its development is therefore not supported. In addition, the housing allocations required for this ALDP are much lower than when the site was previously assessed for the 2012 ALDP.

#### B01/09 Newton Farm

95: Support noted.

515: Although allocation of this site for business and industrial uses would fit well with the surrounding business/industrial uses, there is no requirement from the Strategic Development Plan to identify any further employment land. Also, there are still significant parts of Dyce Drive employment area that remain undeveloped so there is no need to identify any further land in this particular location. The site assessment has been updated as appropriate.

#### B01/16 – Cordyce School

98: This site is largely brownfield in nature. The main issues around the site are flooding and the presence of significant trees. Both these can be avoided if development is restricted to the higher ground. There are 3 proposals for the site – housing, a health and fitness centre and a garden centre and nursery. All three are considered suitable uses for the site, either on their own or in combination. This would need to be reflected in the OP site description. This has been discussed further in Issue 3 – Preferred Housing Sites.

#### B01/17 – Site 1, Persley Park

632: The site is very prominent from the A92 and development would be clearly visible and have a significant impact on the surrounding landscape. The A92 forms a clear boundary between the built-up area to the south and green belt land to the north. Rezoning this site as residential would weaken this robust boundary.

#### B01/18 – Site 2, Cairnfield Place

632: Residential use would not be out of keeping with some of the surrounding properties. The site could still be developed for residential use given the current mixed-use zoning. For that reason, there is no need to rezone it for housing.

#### B01/19 – Site 3, Cairnfield Gardens

632: Residential use would not be out of keeping with some of the surrounding properties. The site could still be developed for residential use given the current mixed-use zoning. For that reason, there is no need to rezone it for housing.

#### B01/20 – Site 5, Blacksmiths Croft

632: Residential use would not be out of keeping with some of the surrounding properties. The site could still be developed for residential use given the current mixed-use zoning. For that reason, there is no need to rezone it for housing.

#### B01/21 – Site 6, Blacksmiths Croft

632: Residential use would not be out of keeping with some of the surrounding properties. The site could still be developed for residential use given the current mixed-use zoning. For that reason, there is no need to rezone it for housing.

#### B01/22 – Site 7, Plot adjoining Cairnview Gardens

632: Residential use would not be out of keeping with some of the surrounding properties. The site could still be developed for residential use given the current mixed-use zoning. For that reason, there is no need to rezone it for housing.

### **Bridge of Don**

#### Bridge of Don General

23, 25, 28: Bridge of Don has had significant allocations in the extant ALDP. Some of these allocations are yet to be completed. Comments on Spatial Strategy have been discussed further in Issue 2 – Settlement Strategy.

#### B02/03 Mundurno

23, 24, 25, 26, 28, 472, 538: Agreement noted. Development of this site would weaken the strong green belt boundary provided by the B999 north of Denmore. The site location offers few sustainable transport options. Development of the site would be inappropriate.

#### B02/04 Aberdeen Innovation Park

472, 538: Although part of the site may be greenfield, it is allocated in the extant ALDP for specialist employment use. The Council intends to carry this zoning forward to the next ALDP.

538: It is at the developer's discretion when to carry out any community engagement.

533: Introduction of new uses to this area will potentially erode the nature of the business park. Although certain uses would be considered more appropriate than others and would

not conflict with existing land uses, the Council feels that the specialist employment zoning is appropriate at this time.

#### B02/05 Aberdeen Energy Park

472, 538: Although part of the site may be greenfield, it is allocated in the extant ALDP for specialist employment use. The Council intends to carry this zoning forward to the next ALDP.

538: It is at the developer's discretion when to carry out any community engagement.

533: The business park currently has 16.4ha of undeveloped land, most of which is located on the Energy Park extension area (zoned as OP3 – Findlay Farm/Murcar in the 2017 ALDP). While certain uses may be considered appropriate in the business park, it is likely that the introduction of new uses would erode the specialist nature of the business park over time. In addition, rezoning the site would impact on the amenity of the adjacent OP13 AECC Bridge of Don site which is likely to come forward with residential elements.

#### B02/06 AECC Bridge of Don Recycling Centre

472, 538: The Aberdeen City Waste Strategy 2014 - 2025 notes the replacement of the current recycling facility on Scotstown Road as a key priority. The AECC Development Framework was approved and adopted as supplementary guidance to the 2017 ALDP. The Framework presents two options to locate the recycling centre within the site. Option 2 locates the recycling centre along Ellon Road and Option 3 locates it at the north-eastern corner opposite the Aberdeen Energy Park. There is a lack of viable alternatives in the Bridge of Don area. Details regarding traffic and access would be dealt with as part of the planning application process.

#### B02/09 West Dubford

23, 24, 25, 26, 28: Agreement noted.

527, 529: Support for this bid is noted.

28, 472, 527, 529, 538: Aberdeen City Council have previously assessed this bid and rejected it on the grounds set out in the Development Options Assessment Report. Its prominent location means that any development would significantly intrude into the surrounding landscape. The site is designated as a Local Conservation Site and data from the North East Scotland Biological Records Centre show that protected species may be an issue. The proposed development would result in the loss and disturbance of wildlife habitat and species.

#### B02/10 Mundurno

23, 24, 25, 26, 28, 422, 476: Agreement noted.

527: Support for this site is noted.

472, 525, 538: We do not propose to allocate the site for development on the grounds set out in the Development Options Assessment. The site performs green belt functions of contributing to the identity and landscape setting of the city, preventing coalescence between Bridge of Don and Potterton and helping to protect the identity of both areas. Development of the site would introduce alien elements into a landscape which has the character of open farmland. Local primary schools would be unable to cater for the demand generated by a development of this size. The development would also increase the likelihood of motorised travel. A green belt review is not considered necessary because the next ALDP seeks to allocate land on brownfield sites in the first instance as per the Aberdeen City and Shire Strategic Development Plan requirements.

#### B02/11 Newton of Mundurno

25, 26, 28, 422, 476: Agreement noted.

472, 525, 538: We do not propose to allocate the site for development on the grounds set out in the Development Options Assessment. The site performs green belt functions of contributing to the identity and landscape setting of the city, preventing coalescence between Bridge of Don and Potterton and helping to protect the identity of both areas. Development of the site would introduce alien elements into a landscape which has the character of open farmland. Although a primary school is proposed, Old Machar Academy is forecasted to be overcapacity in 2024. Such a scale of development would also increase the likelihood of motorised travel. A green belt review is not considered necessary because the next ALDP seeks to allocate land on brownfield sites in the first instance as per the Aberdeen City and Shire Strategic Development Plan requirements.

#### B02/12 Former AECC

476: Agreement noted.

472, 538: The Council do not propose to allocate this site for a mix of large retail development and class 10 (community and religious use) and 11 (assembly and leisure) uses. The site is allocated in the extant ALDP for mixed-use development. The Council intends to carry this allocation forward to the next ALDP. Although Class 10 and 11 uses are likely to be acceptable, the retail element of the proposal is not. The 2019 Aberdeen City and Aberdeenshire Retail Study notes such a scale of retail development outwith the City Centre is not required. Allocation of this site would be contrary to the town centre first principle and would have unacceptable impacts on existing retail and commercial centres, including the City Centre. Given the nature of the proposal school capacity is not applicable. The Council also notes that such a large scale of development is likely to impact on the existing traffic network, however such issues would normally be dealt with as part of the planning application process.

#### B02/13 Shielhill North & South

23, 24, 25, 26, 28, 422: Agreement noted.

28: Concern over house prices and impact on wildlife and existing residential amenity is noted. The Council do not recommend allocation of this site.

28, 472, 527, 538: The Council do not propose to allocate this site for development. Although a small section of the site was a former quarry, the entirety of the site forms part of an area which acts as a green space buffer between Bridge of Don and Potterton. It has the green belt function of helping to protect the identity of both areas - its development would lead to urban sprawl. Although the site is within proximity to Dubford, accessibility is relatively poor. The Council notes that a primary school is proposed, however, Old Machar Academy is forecasted to be overcapacity in 2024. A green belt review is not considered necessary because the next ALDP seeks to allocate land on brownfield sites in the first instance as per the Aberdeen City and Shire Strategic Development Plan requirements. Any new greenfield development is required to be small scale in nature and should not form extensions to any existing strategic development sites. The Development Options Assessment has been amended where appropriate. Site B02/10 Mundurno has been dealt with separately part of this Issue. Site B02/08 WTR Site has been dealt with under Issue 3 – Preferred Housing Sites.

#### B02/14 Shielhill South

23, 24, 25, 26, 28, 422: Agreement noted.

28: Concern over house prices and impact on wildlife and existing residential amenity is noted. The Council do not recommend allocation of this site.

28, 472, 527, 538: The Council do not propose to allocate this site for development. Shielhill Road is an easily identifiable and robust green belt boundary in this area. Development on this site would intrude into the open countryside and have an unacceptable impact on the landscape setting of the city. The Development Options Assessment has been amended where appropriate. Site B02/10 Mundurno has been dealt with separately as part of this Issue. Site B02/08 WTR Site has been dealt with under Issue 3 – Preferred Housing Sites.

#### B02/15 Berryhill Farm (1)

472, 538, 559: The Council do not propose to allocate this site for development on the grounds set out in the Development Assessment Report. Majority of the site is allocated for employment uses and Scottish Planning Policy requires local development plans to protect employment land. Allocation of this site would be contrary to the Strategic Development Plan which requires the next ALDP to allocate a limited amount of housing land. Although relatively close to existing facilities, local schools would be unable to cater for the demand generated from this development. It is also unlikely to reduce resident's need to travel. The Development Options Assessment has been amended where appropriate. The issue of housing supply is dealt with under Issue 2 – Settlement Strategy. The issue of employment land supply is dealt with under Issue 4 – Employment Land Allocations and Other Proposals.



### B02/16 Berryhill Farm (2)

472, 538, 559: The Council do not propose to allocate this site for development on the grounds set out in the Development Assessment Report. Majority of the site is allocated for employment uses and Scottish Planning Policy requires local development plans to protect employment land. Allocation of this site would be contrary to the Strategic Development Plan which requires the next ALDP to allocate a limited amount of housing land. Although relatively close to existing facilities, local schools would be unable to cater for the demand generated from this development. It is also unlikely to reduce resident's need to travel. The Development Options Assessment has been amended where appropriate. The issue of housing supply is dealt with under Issue 2 – Settlement Strategy. The issue of employment land supply is dealt with under Issue 4 – Employment Land Allocations and Other Proposals.

### B02/17 Berryhill Farm (3)

422, 472, 538, 559: The Council do not propose to allocate this site for development on the grounds set out in the Development Assessment Report. Majority of the site is allocated for employment uses and Scottish Planning Policy requires local development plans to protect employment land. Allocation of this site would be contrary to the Strategic Development Plan which requires the next ALDP to allocate a limited amount of housing land. Although relatively close to existing facilities, local schools would be unable to cater for the demand generated from this development. It is also unlikely to reduce resident's need to travel. The Development Options Assessment has been amended where appropriate. The issue of housing supply is dealt with under Issue 2 – Settlement Strategy. The issue of employment land supply is dealt with under Issue 4 – Employment Land Allocations and Other Proposals.

### B02/18 Causewayend

472, 538, 583: The Council does not propose to identify this site for residential development because it would encroach onto the green belt. This site was considered during the examination into the extant ALDP. The reporter concluded that the site is significantly more prominent in views from the north. Its development would therefore constitute a substantial urban extension into open countryside. In addition, the site is distant from local facilities.  
538: The Council notes that there have been a large number of residential bids in Bridge of Don. We do not propose to allocate this site for development.

### B02/19 Perwinnes

422, 476: Support noted.

472, 538, 583: The Council do not propose to allocate this site for development on the grounds set out in the Development Assessment Report. This site was considered during the examination into the 2012 and 2017 local development plans. The reporter concluded that the green belt status of the land at Perwinnes is appropriate. Its development would significantly affect the landscape of the city. The Council notes that a primary school is proposed, however, Old Machar Academy is forecasted to be overcapacity in 2024. A green belt review is not considered necessary because the next ALDP seeks to allocate land on brownfield sites in the first instance as per the Aberdeen City and Shire Strategic

Development Plan requirements. Any new greenfield development is required to be small scale in nature. The Development Options Assessment has been amended where appropriate.

538: The Council notes that there have been a large number of residential bids in Bridge of Don. We do not propose to allocate this site for development.

#### B02/20 Cloverhill

538: Objection to the development is welcomed and noted.

292, 293, 532, 603, 604, 607, 585, 586, 587, 588, 589, 590, 601, 602: Support for development noted.

292, 293, 472, 532, 534, 538, 585, 586, 587, 588, 589, 590, 595, 601, 602, 603, 604, 607: The Council do not propose to allocate this site for residential-led mixed use development on the grounds set out in the Development Options Assessment Report. The site is allocated for employment uses and Scottish Planning Policy requires local development plans to protect employment land. With regards to the Energetica Corridor, the vision is for the corridor to be internationally recognised as the location of choice for high value oil and gas and renewable energy organisations. The site's continual zoning for employment uses supports Energetica's long term vision. Allocation of this proposal would be contrary to the Strategic Development Plan which requires the next ALDP to allocate a limited amount of housing land. With regards to OP13 AECC Bridge of Don, it is one of many sites allocated for housing in Bridge of Don along with OP5 Balgownie Centre, OP7 Gordon Centre, OP8 East Woodcroft North, OP9 Grandhome and OP10 Dubford which are all due to be completed. There is therefore no need to allocate any further housing land in the Bridge of Don area. The Council notes that there is a very small number of residential properties within the site area however these have been located there historically before the site was zoned for employment use.

#### B02/21 Balgownie Area 2

472, 538, 512: This site is zoned as urban green space in the extant ALDP. The Council intends to carry this forward into the Proposed ALDP. Aberdeen has an adequate supply of employment land and there is no requirement from the Strategic Development Plan to identify any more. While the University may no longer have a requirement for this site's use, there is no evidence to suggest that there isn't a wider community requirement for this area of open space to be retained. Site B02/04 Aberdeen Innovation Park has been dealt with separately as part of this Issue.

#### B02/23 Balgownie

472, 538, 512: This proposal has five distinct proposals which have been dealt with separately as part of this issue with the exception of B02/25 which has been dealt with under Issue 3 – Preferred Housing Sites. Most of these playing fields are flat, of high quality and are used for recreation. While the University may no longer have a requirement for this site's use, there is no evidence to suggest that there isn't a wider community requirement for this

area of open space to be retained. The Council intends to carry forward the existing urban green space and green space network designations to the Proposed ALDP with the exception of Area 4.

#### B02/24 Balgownie Area 3

512, 538: This site is zoned as urban green space in the extant ALDP. The Council intends to carry this forward to the Proposed ALDP. This site is flat and currently used for recreation purposes. Development on the site would put an end to this and is therefore not considered appropriate. While the University may no longer have a requirement for this site's use, there is no evidence to suggest that there isn't a wider community requirement for this area of open space to be retained. The Development Options Assessment has been amended where appropriate.

538: Agree there have been a large number of residential bids in Bridge of Don and their allocations would have an impact on traffic, air quality and school capacity. We do not propose to allocate this site for development.

#### B02/26 Balgownie Area 5

472, 512, 538: This site is zoned as urban green space in the extant ALDP. The Council intends to carry this forward to the Proposed ALDP. This part of the fields is high quality and is currently used for recreation purposes. Development on the site would put an end to this and is therefore not considered appropriate. While the University may no longer have a requirement for this site's use, there is no evidence to suggest that there isn't a wider community requirement for this area of open space to be retained. Site B02/03 Balgownie has been dealt with separately as part of this Issue.

538: Agree there have been a large number of residential bids in Bridge of Don and their allocations would have an impact on school capacity. We do not propose to allocate this site for development.

#### B02/27 North of Balgownie

472, 512, 538: This site is designated urban green space and green space network in the extant ALDP. The Council intends to carry this forward to the Proposed ALDP. The site is relatively small and would be unlikely to accommodate all 18no houses. Noise could also be an issue as it is next to the A92. Development Options Assessment has been amended as appropriate. In addition, in the 2017 ALDP examination, the Reporter noted the expected increase in population to occur in north Aberdeen and the need to have outdoor sports provision. For these reasons the Council does not propose to allocate this site for residential development.

538: Agree there have been a large number of residential bids in Bridge of Don and their allocations would have an impact on school capacity. We do not propose to allocate this site for development.

#### B02/28 Land West of Balgownie Road

472, 538: Agree there have been a large number of residential bids in Bridge of Don and their allocations would have an impact on traffic, air quality and school capacity. We do not propose to allocate this site for development.

#### B02/30 Land at Corse Hill

60: We do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. Site forms part of the green space network, green belt and is part of a Local Nature Conservation Site. In addition, the site is distant from facilities and would encourage use of the private car.

#### B02/31 Balgownie Area 2 Residential

512: This site is zoned as urban green space in the extant ALDP. The Council intends to carry this forward to the Proposed ALDP. This part of the playing fields is well used and maintained. Residential development would take away this outdoor sports provision. In addition, the site is landlocked without development at Campus One site 02/35 (dealt with separately under this Issue). For that reason, development would therefore not be appropriate.

#### B02/32 Silverburn House

517: The Council do not propose to allocate this site for residential development on the grounds set out in the Development Options Assessment Report. The site is allocated for employment uses and Scottish Planning Policy requires local development plans to protect employment land. Allocation of this site would erode the specialist nature of the employment area. The Bridge of Don area already comprises numerous allocations due to be completed. There is therefore no need to allocate any further housing land in this area.

#### B02/33 Shielhill South

527: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. Shielhill Road is an easily identifiable and robust green belt boundary in this area. Development on this site would intrude into the open countryside and have an unacceptable impact on the landscape setting of the city. It would also be contrary to the Strategic Development Plan requirements noting development should not form extensions to any existing strategic development sites. Sites B02/08 and B02/13 have been dealt with separately under this Issue.

#### B02/34 WTR Site Extension

529: The Council do not propose to allocate this site for residential development. The northern part of this site (B02/08) was previously assessed and is discussed under Issue 3 – Preferred Housing Sites. Whilst the northerly section of the site remains desirable, there is no justified merit in an extension as its development would result in the loss and disturbance of wildlife habitat and both designated and protected species in the Local Nature

Conservation Site. Allocation of this extended site is unlikely to accord with the Strategic Development Plan. A Development Options Assessment for this proposal has been completed.

#### B02/35 Campus One, Aberdeen Innovation Park

537: The Council do not propose to allocate this site for residential development on the grounds set out in the Development Options Assessment Report. The site is allocated for employment uses and Scottish Planning Policy requires local development plans to protect employment land. Allocation of this site would erode the specialist nature of the employment area. In addition, the site is landlocked without development at Balgownie Area 2 Residential B02/31 (dealt with separately under this Issue). For that reason, development would therefore not be appropriate.

### **Kingswells**

#### B03/02 Gillahill

15, 37, 138: Agreement noted.

15, 37, 138, 582: This site was considered during the examination into the 2012 and 2017 local development plans. The Reporter concluded its green belt status was justified by reasons of protecting the setting of Kingswells and preventing encroachment into the countryside that separates Kingswells from Aberdeen. Although the proposal includes a primary school, the Council feels that the green belt status function of the site still stands. Residential development would therefore be inappropriate in this location.

#### B03/03 Sunnyfield

138: Agreement noted.

32, 138: This is an area of greenbelt which separates Kingswells from Aberdeen. Development on the site would appear prominent given the elevation of the site. The Council do not propose to allocate this site for development.

#### B03/04 Land at Woodend Hospital

507, 509, 584, 510, 523, 621: Support of Council's undesirable status for this site is welcomed.

526: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. Although it is accepted that the proposed use of the site would provide a positive facility for older people, this benefit is greatly outweighed by the negative impact that development on this site would have on the green space network, surrounding wildlife habitats and nearby tree preservation orders. The site is also steeply sloped making development difficult.

#### B03/05 Gateside Farm

138: Support of Council's undesirable status for this site is welcomed.

580: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. The site is highly visible and forms part of the green belt and green space network. It would also be contrary to the Strategic Development Plan requirements noting development should not form extensions to any existing strategic development sites.

#### B03/06 Huxterstone

138: Support of Council's undesirable status for this site is welcomed.

582: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. This site was considered during the examination into the 2012 and 2017 Local Development Plans. The reporter concluded that its green belt status was appropriate; its development would clearly and visibly encroach into the existing open gap that separates Kingswells from Aberdeen due to its high level of visibility from the A944 and the lack of any strong boundary feature to the east to act as a 'full stop' to development towards Aberdeen.

#### B03/07 Land adjacent to Ardene House

101: We note that planning application 181336/DPP has a willingness to approve pending legal agreement (18th April 2019) for the erection of class 3 units including drive-thru facilities. The ALDP does not allocate class 3 units under a particular zoning. The existing zoning of Specialist Employment Area will not prevent this development from coming forward given that planning consent has already been issued (pending appropriate legal agreement). We therefore do not believe it is necessary to amend the zoning of this site.

#### B03/09 Derbeth, Kingswells

35, 95: Support of Council's undesirable status for this site is welcomed.

565: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. This site was considered during the examination into the 2012 and 2017 Local Development Plans. The reporter concluded that its green belt status was appropriate as it occupies rising ground between Kingswells and the AWPR. The Proposed Strategic Development Plan asks the ALDP to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current "constrained" supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition, allocations should be small scale in nature, and should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise.

#### B03/10 Prime West

138, 476, 596: Support of Council's undesirable status for this site is welcomed.

583: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. The entire site is zoned as a specialist employment area in the extant ALDP and is largely part of OP29 Prime Four except a strip to the north which is part of OP63 Prime Four Expansion. Development of the site for retail would not directly support the existing uses on site and would erode the nature of the allocation of which the aim is to maintain a high-quality environment. A large retail development here would be contrary to the town centre first principle and may have unacceptable impacts on existing retail and commercial centres, including Aberdeen City Centre. The Proposed Strategic Development Plan asks the ALDP to protect allocated employment land from other uses. Because of this, the allocation of this site for retail is likely to be contrary to the Proposed Strategic Development Plan.

#### B03/11 Prime Four North

138: Support of Council's undesirable status for this site is welcomed.

583: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. Development on this site would intrude on the surrounding landscape, especially from the Kingswells bypass. On the southern boundary is Kingswells consumption dyke. This provides a robust green belt boundary to the Prime Four development to the south. Development on the site would alter the views from the AWPR to the west and would also encroach upon the open space between Kingswells and the AWPR, thus making the site undesirable for development.

#### B03/12 East Kingsford

95, 138: Support of Council's undesirable status for this site is welcomed.

583: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. The green belt serves a vital function in this area preventing the coalescence of Kingswells and Westhill. Although the site is already in use with small scale industrial units, this use is in line with the green belt policy. Were a planning application to be submitted for small scale development on this site it would be assessed on its merits against the green belt policy. We do not believe it would be appropriate to rezone this small section of the Green Belt as an opportunity site.

#### B03/14 Maidencraig North West 1

37, 138, 476: Support of Council's undesirable status for this site is welcomed.

540: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. The area to the east and south has been identified for development in the extant ALDP. This site was submitted for consideration during the process of preparing the 2012 and 2017 Local Development Plans (for business and

residential uses) and at that time it was considered that the existing track from the Lang Stracht to Fernhill cottage provided a robust boundary for the development. The Proposed Strategic Development Plan states that new allocations should not be extensions to any existing strategic development sites that have been subject to a masterplanning exercise. This site forms part of an area of open countryside which serves to prevent the coalescence Kingswells and Aberdeen and helps to maintain their separate identities. It is therefore appropriately designated as green belt.

#### B03/15 Maidencraig North West 2

37, 138: Support of Council's undesirable status for this site is welcomed.

540: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. The area to the east and south has been identified for development in the extant ALDP. This site was submitted for consideration during the process of preparing the 2012 and 2017 Local Development Plans (for business and residential uses) and at that time it was considered that the existing track from the Lang Stracht to Fernhill cottage provided a robust boundary for the development. The Proposed Strategic Development Plan states that new allocations should not be extensions to any existing strategic development sites that have been subject to a masterplanning exercise. This site forms part of an area of open countryside which serves to prevent the coalescence Kingswells and Aberdeen and helps to maintain their separate identities. It is therefore appropriately designated as green belt.

#### B03/16 Smiddybrae

95, 476: Support of Council's undesirable status for this site is welcomed.

605: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. The Proposed Strategic Development Plan states that there is no need to identify any further employment land in Aberdeen. In addition, there are several allocations of employment land within close proximity of the site at Prime Four (OP29), the Prime Four Extension (OP63) and East Arnhall (OP34), as well as developments in Westhill. Allocation of the site for retail uses is also considered to be inappropriate as it would be contrary to the sequential approach of taking into account the existing retail hierarchy and would potentially result in additional traffic on the A944. It is considered that the site is best retained as greenbelt. Green Belt policy allows for development associated with existing activities, including businesses, to be permitted.

#### B03/21 Huxterstone

37: Support of Council's undesirable status for this site is welcomed.

138: The Council do not propose to allocate this site for development on the grounds set out in the Development Options Assessment. The site sits on 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 significantly encroach into the open



countryside which separates Kingswells from Aberdeen. It is therefore considered to be inappropriate for residential development.

## **Northfield**

### B04/04 Northfield Medical Practice

544: Supports strategy to encourage brownfield development within the city. Notes the site is not in the list of preferred sites and welcomes further discussion with the Council to learn the reasons why, and the potential of these being added into the local development plan. Believes this is a valid bid site.

544: The existing use of the site as a medical centre fits well within the current neighbourhood centre zoning. Neighbourhood centres are the preferred location for local retail, commercial/leisure, community and cultural provision. The medical centre most likely supports the chemist which is also located within the neighbourhood centre. A residential use is unlikely to provide this same level of support. For that reason, it is not considered appropriate.

### B04/05 Haudagain Triangle Rezoning

564: Middlefield is a priority area for Aberdeen City Council and Community Planning Aberdeen for neighbourhood regeneration. Suggests alternate re-zoning for a mix of residential, retail, commercial and community uses to support regeneration of the area.

564: Welcome alternate rezoning of this site for a mix of uses. This site is currently zoned in the extant ALDP for residential use. It is accessible and well located within an existing urban residential area. Proposed uses would help to facilitate further service provision and employment opportunities.

## **Tillydrone/Seaton/Old Aberdeen**

### B06/02 Land at Lord Hays Grove (Ph 2)

422: Support noted.

592: The Council agrees that the site is small in scale and to some extent would have limited impacts. However, part of the site is within the River Don Corridor Local Nature Conservation Site. It also makes up part of the wider Green Space Network in the area and forms part of a significant gateway into Aberdeen at the Bridge of Don. The area appears to be well-used by the local population for recreation because of its proximity to Donmouth Local Nature Reserve. The purpose of the bid assessment is to look at the principle of development and every site has been independently assessed. However, given the comments, the site assessment has been re-assessed and updated as appropriate. The Council feels that development of this site would result in the loss of a significant green corridor. Therefore, rezoning it for residential use would be inappropriate.

**Midsocket/Rosemount**

B07/01 Land adjacent to Cornhill Road

422: Support noted.

544: Although the proposed use is compatible with surrounding uses, the site is located in a significant area of open space comprising mature trees protected through a TPO. Recent development in this area has resulted in the incremental loss of open space. It is felt that the open space contributes to the overall amenity of the area thus making it inappropriate to allocate the site for residential use.

**Planning authority action/recommendation for Proposed Plan**

Identify as an B04/05 Haudagain Triangle Rezoning as an opportunity site for a mix of residential, retail, commercial and community uses.

Include a garden centre as one of the possible appropriate uses for the site in relation to Cordyce School.

<b>Issue 7</b>	<b>Undesirable Sites - South</b>
<b>Section of the MIR to which the issue relates:</b>	Section 2 Settlement strategy
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Deeside</b></p> <p><u>B09/01 Culter House Road Phase 2</u></p> <p>442, 574: Agree with undesirable designation of the site. Developing the site will lead to coalescence, a detrimental impact on ancient woodland, landscape, and traffic. Density policy is not met.</p> <p>519: Disagree with undesirable designation. The site should be allocated in the local development plan for residential development. OP52 and OP113 have been allocated; these have similar challenges to B09/01.</p> <p><u>B09/03 – West Craigton Farm</u></p> <p>536, 537, 578, 599, 630, 631: Agree with undesirable designation of the site. Development of the site will lead to an adverse impact on the environment, wildlife, Green Belt, visual impact, flooding, and infrastructure.</p> <p><u>B09/04 Countesswells Woods</u></p> <p>100, 219, 220, 221, 222, 223, 224, 225, 229, 546, 548: Disagree with undesirable designation. The site should be allocated in the local development plan for residential development. The site is well located for development, is close to existing facilities, will improve biodiversity and has good connectivity</p> <p>574: Support the undesirable designation of the site. Development will lead to an adverse impact on greenspace, ancient woodland, accessibility, coalescence, and infrastructure. The site does not meet the density policy.</p> <p><u>B09/05 Culter House Road</u></p> <p>422, 574: Support the undesirable designation of the site. The site will have a detrimental impact on the ancient woodland. School infrastructure is at capacity. The site will cause coalescence, is remote from public transport and is therefore car dependent. The site does not comply with the density policy.</p> <p>535: Disagree with undesirable designation. The site should be allocated in the local development plan for residential development. Site is similar to OP113 which has been allocated for residential use. The Aberdeen Western Peripheral Route has fragmented and</p>	

eroded the greenbelt and greenspace network. The site is not detached from Milltimber and will add to the landuse mix. Services are typical for a residential suburb, and Milltimber Primary and the proposed Countesswells Academy could accommodate the development.

#### B09/06 Contlaw

422, 476, 574, 599: Support the undesirable designation of the site. Road, transport, school, and health service infrastructure is at capacity. There would be a detrimental impact on landscape, and the site is greenbelt. Development would lead to coalescence.

525: Disagree with undesirable designation. The site should be allocated in the local development plan for residential-led mixed use development. The Aberdeen Western Peripheral Route has changed the character of the area and this site provides a logical expansion to Milltimber. Landscape impact will be addressed through siting of development and existing planting. Schooling issues can be addressed through onsite provision, developer obligations and rezoning. The scale of the site will allow for a mix of uses and improved public transport therefore increasing the range of community facilities.

#### B09/07 – Albyn Playing Fields

422, 574, 599: Support the undesirable designation of the site. Development will lead to coalescence, be detrimental to the Aberdeen Western Peripheral Route junctions, and put pressure on school and healthcare services. The site is greenbelt and greenspace network.

545: Disagree with undesirable designation. The site should be allocated in the local development plan for residential use of 100 units. Development will deliver a smaller scale site and will avoid the failure of housing delivery. Suitable replacement sports facility will be provided for the pupils of Albyn School. Greenspace and trees cover will be retained, the site is in close proximity to community facilities and schooling issues can be addressed through proposed new built schools. Coalescence will not occur due to the Aberdeen Western Peripheral Route.

#### B09/08 Countesswells

422, 574: Support the undesirable designation of the site. The site is within the Foggieton Local Nature Conservation Site, and is isolated from community facilities and transport, and will put pressure on education facilities. Development will lead to coalescence between Countesswells and Cults.

386: Disagree with undesirable designation. The site should be allocated in the local development plan as a residential led mixed-use development of 500 houses, with business/retail and community uses. The site represents a good future reserve development for the period 2033-2040.

#### B09/09 Pineacres Contlaw Road

574: Support the undesirable designation of the site. The site will lead to substantial tree loss and have a detrimental impact on traffic. Concerns are raised regarding integration with OP112: West of Contlaw Road, and density. Public transport links are acceptable.

608: Disagree with undesirable designation. The site should be allocated in the local development plan as a small scale residential developments for 12 homes. The greenbelt and greenspace network policies are restrictive and unnecessary. The woodland is not ancient woodland. The site is close to community facilities, core paths and a bus stop.

#### B09/10 Friarsfield North

422, 506, 522, 572, 574: Support the undesirable designation of the site. The site is on greenbelt and development will result in the loss of old woodland, the displacement of wildlife and an increase in air pollution from traffic. There are impacts on school capacity, and landscape. The site is poorly located to public transport and facilities, and will be car dependent.

565: Disagree with undesirable designation. The site should be allocated in the local development plan as a residential development. The site will meet a shortfall in housing, will deliver affordable housing to the area, is in a sustainable location with active travel routes, and is close to schools. There will be no unacceptable landscape or visual impact. The site was previously allocated in the 2004 Finalised Aberdeen Local Plan (Green Spaces New Places).

#### B09/11 Land at Culter House Road

422, 615, 574, 599: Support the undesirable designation of the site. The site is greenbelt and greenspace network. Development would lead to coalescence, would be detrimental to the Aberdeen Western Peripheral Route junctions, and would put significant pressure on school and healthcare services. There is limited access for vehicles, pedestrians and cyclists.

615: The site should be allocated in the local development plan as a commercial garden centre. The residential element of the original bid B09/11 has been removed.

#### B09/12 Craigton Road South 1

422, 574: Support the undesirable designation of the site. The site will have a detrimental impact on the greenbelt, greenspace network and the Pitfodels conservation area. Development will lead to coalescence. Does not comply with density policy.

583: Disagree with undesirable designation. The site should be allocated in the local development plan as residential development for 70-75 units. The site is partial brownfield and can be developed immediately. The site is located next to existing and new infrastructure and would be a logical extension of the settlement. The character of the conservation area is changing due to modern development and infrastructure. The impact to woodland and landscape features and protected species would be minimal, and development could

strengthen the greenspace network and informal path network. A green belt review is required.

#### B09/13 Craigton Road South 2

422, 574: Support the undesirable designation of the site. The site will have a detrimental impact on the greenbelt, greenspace network and the Pitfodels conservation area. Development will lead to coalescence.

583: Disagree with undesirable designation. The site should be allocated in the local development plan as residential development for 30 units. The site is partial brownfield and can be developed immediately. The site is located next to existing and new infrastructure and would be a logical extension of the settlement. The character of the conservation area is changing due to modern development and infrastructure. The impact to woodland and landscape features and protected species would be minimal, and development could strengthen the greenspace network and informal path network. A green belt review is required.

#### B09/14 Craigton Road South 3

422: Support the undesirable designation of the site.

583: Disagree with undesirable designation. The site should be allocated in the local development as a mix of commercial uses, a care home and garden centre. The site is partial brownfield and can be developed immediately. The site is located next to existing and new infrastructure and would be a logical extension of the settlement. Previous horticultural use of the walled garden would be reinstated. The character of the conservation area is changing due to modern development and infrastructure. Development would provide employment opportunities. The impact to woodland and landscape features and protected species would be minimal, and development could strengthen the greenspace network and informal path network. A green belt review is required.

#### B09/15 Land at Sunnyside

574: Support the undesirable designation of the site. The site will have a detrimental impact on green belt and woodland. The site is located on the edge of OP41: Friarsfield, where the woodland forms a defensible boundary. The proposed development would erode this.

611: Disagree with undesirable designation. The site should be allocated in the local development for 2 house plots. The development would strengthen the greenbelt designation and the woodland boundary. The green belt designation can be modified to accommodate development; therefore, it is not a reason not to allocate land for future development.

#### B09/16 Craigton

536, 537, 578, 599, 630, 631: Support the undesirable designation of the site. The site will have a detrimental impact on green belt, greenspace network, woodland, natural habitat and wildlife. There will be negative impacts on setting and landscape character. Concerns are

raised regarding transport and access to public transport. The development will have a detrimental on the limited drainage, power and communications infrastructure. There will be pressure on school and healthcare services. Development could exacerbate existing flooding issues. Previous bids have been rejected by the Reporter.

611: Disagree with undesirable designation. The site should be allocated in the local development for 20 houses. The site is a natural extension to the northern edge of Peterculter and is close to a bus service and neighbourhood centre. There are no technical reasons or environmental designation constraints in terms of greenspace network, protected species or green belt. The site was previously allocated in the 2004 Finalised Local Development Plan but removed due to traffic concerns. The traffic situation has changed significantly since the Aberdeen Western Peripheral Route opened. The development, in conjunction with other opportunity sites in the area, has scope to upgrade infrastructure. There are other opportunity sites in the locale.

#### B09/17 Land at Inchgarth Mews, Cults

574: Support the undesirable designation of the site. The site is zoned as green belt. Development will have a detrimental impact on the River Dee Local Nature Conservation Site, landscape and visual impact. The site is isolated from Cults and will lead to coalescence between Cults and Aberdeen. There are concerns relating to traffic impact and the capacity of the schools.

611: Disagree with undesirable designation. The site should be allocated in the local development plan for 15 houses. There are no technical reasons or environmental designation constraints in terms of greenspace network or green belt. The site shares a boundary with Cults and can be developed in conjunction with B0944 (planning application 181224/PPP). Access can be taken onto Inchgarth Road. There will be no detrimental impact on landscape or landscape character due to existing tree cover and proposed housing density which relates to the context and is in character with the area, and a 60-meter buffer is proposed to the River Dee Corridor Local Nature Conservation Site. The site is well connected to services and facilities in Cults and Garthdee and will benefit from the improved infrastructure proposed under B0944 (planning application 181224/PPP).

#### B09/18 Mill of Brotherfield

574: Support the undesirable designation of the site. The site is zoned as green belt. Development is isolated and will be car dependent. The proposal does not meet the density policy.

#### B09/19 – Land at Craigton Road

522, 574: Support the undesirable designation of the site. The site is zoned as green belt. The development will lead to coalescence between Cults and Countesswells and will have a negative visual impact. The site will be car dependant and it does not meet the density policy. There are concerns relating to capacity of schools. Access will be taken from OP41 Friarsfield.

#### B09/20 Binghill Farm

574: Support the undesirable designation of the site. The site extends Milltimber northwards, and it is remote from community facilities. The site relies on Oldfold delivery facilities. The site will be car dependant therefore increasing traffic, and the proposal does not meet density policy. There are concerns about education capacity.

617: Disagree with undesirable designation. The site should be allocated in the local development plan for 100 residential units. Development will increase the market choice in the area as it is now proposed to include retirement accommodation (bungalows) and supported living flats provided as Binghill House (a new bid), along with mainstream housing. The site is accessible with good connections to community facilities. The green belt designation can be modified to accommodate development; therefore, it is not a reason not to allocate land for future development. A review of the green belt is required. The landscape will not be impacted as the site relates to Oldfold and the site provides a more natural northern edge to Oldfold than the existing diagonal. The 90-95 metre contour line is not justified as other developers are present above this line.

#### B09/21 Countesswells Expansion

422, 516, 574: Support the undesirable designation of the site. The site is zoned as green belt and will be an extension to the existing masterplan area. The proposal does not meet the density policy, and it premature as development as Countesswell is still ongoing. The site will lead to coalescence between Countesswells and Cults/ Bielside. There will be detrimental impacts on ancient woodland and landscape. There are concerns regarding infrastructure capacity, lack of sustainable transport options and flooding risk. The site is remote from community facilities. The development does not comply with a number of strategic plans and reports.

#### B09/21 Countesswells Expansion Sites 4, 5, 6

610: Disagree with undesirable designation. The site should be allocated in the local development plan for approx. 545 units as future organic growth of Countesswells. The green belt designation can be modified to accommodate development; therefore, it is not a reason not to allocate land for future development. To maximise the infrastructure at Countesswells, further land should be allocated. The sites are well connected to OP38 in terms of landscape, accessibility, and future community facilities and services, including public transport. There would be no impact to landscape and woodlands and shelter belts would be strengthened, increasing habitat connectivity. Site 4 was considered by the Reporters at the previous examination and was deemed an acceptable development site should further housing need arise.

#### B09/21 Countesswells Expansion Sites 2, 3, 7

506: Support the undesirable designation of the site. Sites 2 and 7 are zoned green belt. Development will have a detrimental impact to greenspace network, natural environment, priority habitats and landscape impact. Development will lead to coalescence between Countesswells and Cults. The site would be car dependent, and there are concerns with



education capacity. The site was discussed in the previous local development plan Reporters Report. Developer does not have full ownership and access/servitude rights.

572: Support the undesirable designation of the site. Site 7 was previously discounted as a development site due to a loss of woodland, disturbance to designated species and impact on the surrounding landscape. There are issues with the availability of access, and there is no option on the site. The development will have a detrimental impact on nature conservation. The site is remote in terms of accessibility and connectivity, and road and path infrastructure. There is a watercourse on the site. The Thornhill Countesswells Development Strategy contains a number of a number of misleading statements relating to site boundaries, land ownership and options, and access points.

610: Disagree with undesirable designation. The site should be allocated in the local development plan as future organic growth of Countesswells. The green belt designation can be modified to accommodate development; therefore, it is not a reason not to allocate land for future development. To maximise the infrastructure at Countesswells, further land should be allocated. The sites are well connected to OP38 in terms of landscape, accessibility, and future community facilities and services, including public transport. There would be no impact to landscape and woodlands and shelter belts would be strengthened, increasing habitat connectivity. Site 3 was considered by the Reporters at the previous examination and was deemed an acceptable development site should further housing need arise. The possibility of coalescence with Cults and the urban Aberdeen would be mitigated by existing woodland and proposed strategic landscaping.

#### B09/22 Land at West Craigton / Blaircara Village

422, 503, 536, 537, 578, 599, 630, 631: Support the undesirable designation of the site. The site is zoned as greenbelt and greenspace network and the River Dee and Peterculter Burn are designation Special Areas of Conservation. There are concerns regarding flooding and the floodplain, and any exacerbation of this or impeding of flood water through altering planning or ground levels. Development would have a detrimental impact on the semi-rural character, intrude on the surrounding landscape and could impact on wildlife and habitats. The Reporters unit has previously stated the 'shoddy' forms a natural edge to the village. The site is remote from community facilities and services, and there are constraints to footpath improvements due to ownership. There will be additional traffic movements onto Malcolm Road with potential safety concerns. No requirement for more housing. Existing infrastructure is at capacity.

318, 554, 560, 600: Disagree with undesirable designation. The site should be allocated in the local development plan as an elderly care / sustainable mixed community and should not be assessed as residential. The site provides positive mixed use of housing for the elderly and students. It is a good design with open space and has environmental benefits. The site does not undermine the greenbelt, and the integrity of the Cutler Burn and the Local Nature Conservation Site would be maintained.

#### B09/23 Hillhead of Pitfodels

422, 574: Support the undesirable designation of the site. The site is zoned as green belt. Development will lead to coalescence between communities. The site will be car dependant and there are concerns regarding capacity at educational facilities.

#### B09/24 Land at Loirsbank Road

574: Support the undesirable designation of the site. The site is subject to flooding. There will be detrimental impacts on landscape due to the proximity of development to the River Dee and the open character south, and remedial works require to mitigate flooding. The site is vulnerable and previous approved development, although complete, does not justify further development on the site.

541: Disagree with undesirable designation. The site should be allocated in the local development plan for residential development of 4-5 units . Flooding and drainage issues can be mitigated, and development will ensure well considered sitting. Reporters response regarding planning application P111566 noted there was no flooding risk to the development of 4 houses. The development will be well integrated, in keeping with the context and have no impact on landscape. Green belt zoning should not apply as the site was previously allocated for 10 houses in the 2008 local plan, and consent was granted for 8 houses. Site will enhance active travel routes.

#### B09/25 Highview House, Countesswells

574: Support the undesirable designation of the site. The site is zoned green belt and is sloping. Development would be isolated from existing settlement with no east access to facilities. It is likely to be car dependant. Development will be highly visible from the south, and it is adjacent to ancient woodland.

520: Disagree with undesirable designation. The site should be allocated in the local development plan for residential development of 5 units. The green belt designation does not achieve the objectives of the greenbelt. The site is not valuable habitat, nor does it contribute to the green space network function. The development of Countesswells will change the site's relationship to existing settlement and proximity to facilities, accessibility and service infrastructure capacity. Landscape features on site can be retained, and other constraints can be managed.

#### B09/26 Huxterstone

422, 574: Support the undesirable designation of the site. The site is green belt and is sloping. Development will lead to coalescence, and an increase in traffic.

568: Disagree with undesirable designation. The site should be allocated in the local development plan for a health care village and commercial use. The green belt does not contribute to the setting of the city. Development would be carefully sited on the slope and landscape features retained. The A944 has the form of a development corridor.

B09/27 Contlaw Road

514, 574: Respondents support an increased capacity of units on the site, which is allocated in the current Plan as OP112, for 10 units.

B09/28 Land West of Malcolm Road

514: supports development on this site and disagrees with the site assessment scoring.

536, 537, 578, 599, 630, 631: respondents agree with the 'undesirable' assessment of the site. Common reasons for objection to development comprise; loss of Green Belt land, unsuitable rural location for access and services, adverse impact on the environment and setting of the site.

B09/29 Guttrie Hill West

574, 599: respondents agree with the 'undesirable' assessment of the site. Common reasons for objection to development comprise; loss of Green Belt land/ Green Space Network and road safety and traffic implications.

391: the respondent wrote in support of the bid, with a supporting statement provided. The respondent provides commentary on the bid assessment scoring process and comments on potential loss of greenfield land and ancient woodland. Reasons to support the bid include the attractiveness of self-build opportunity, benefits of compensatory planting and proximity to ample services within Peterculter.

B09/30 Guttrie Hill East

599, 574: respondents agree with the 'undesirable' assessment of the site. Common reasons for objection to development comprise; loss of Green Belt, road safety and traffic implications, unsuitable location.

389: Respondent supports the bid for this site and is supportive of the benefits brought as an 'alternative fuel' station for sustainable travel.

B09/31 Friarsfield Woodley

574: supports undesirable recommendation notes reasons including; unnecessary development, Friarsfield access already set out in the Development Framework

B09/32 Hillhead of Countesswells

609: respondent supports this bid; does not believe there is impact on the Green Belt or the environment and would help deliver housing in the area as a suitable land release site. The respondent disagrees with the bid assessment scoring of the site.

574: respondent does not support development on the site; notes that the site is poorly located to Cults and City in terms of public transport and amenities, loss of trees, sporadic in rural context

B09/33 Damhead Cadgerford (Westhill / Kingswells)

034, 095, 574: Agree with the undesirable assessment of the site; common reasons for not supporting the bid include impact on the landscape and setting of the site, presence of the pipeline hazard area, and impact of development on services in Westhill.

487: Supports the bid and allocation of the site as Strategic Reserve for housing and employment land, representing long term growth of Westhill. Another part of the site within the Aberdeenshire Council boundary was deemed potentially suitable in principle for employment land. Comments in support of the bid are made in relation to landscape and setting of the site, strategic growth, infrastructure and constraints.

B09/34 Kennerty Farm (Peterculter)

599: Does not support development on this site; reasons include problematic access and servicing of the site and environmental concerns including loss of Green Belt and interruption of the Green Space Network.

B09/35 Newmill Hill (Peterculter)

599: Does not support the proposed development on the basis of; adverse impacts to the environment and landscape, including loss of Green Belt/ Green Space Network, and concerns over infrastructure capacity.

540: Supports the allocation of this site for 50 homes. The respondent notes that the site is serviceable, with good access from A93, and notes the importance of housing delivery in the area. The site assessment scoring process is queried, with scores relating to environmental constraints and landscape impact being unreasonable.

B09/36 Treespark 1 (Pitfodels)

540: Supports allocation of this site for around 10 homes on part of the site. It is noted that the site does not contribute to the ecological or landscape value of the area and supports development on the site for delivering homes in the area. The site assessment scoring process is queried, particularly in relation to the site's relationship with the existing settlement.

574: Respondent supports the recommendation of 'Undesirable', reasons for this include concerns over Green Belt development and density requirements of development.

B09/37 Treespark 2 (Pitfodels)

540: Respondent supports allocation of this site for around 40 homes in total. It is noted that the site does not contribute to the ecological or landscape value of the area and supports development on the site for delivering homes in the area. The site assessment scoring process is queried, particularly in relation to the site's relationship with the existing settlement.

574: Respondent supports the recommendation of 'Undesirable', reasons for this include concerns over Green Belt development and density requirements of development.

B09/38 Lovers' Walk (Peterculter)

574, 599: Agree with the assessment of the site as 'Undesirable' for the proposed development. Reasons for this comprise; unsuitable location with regards to Green Belt and Green Space Network, landscape and visual impact, concerns over density requirements of development and infrastructure capacity.

540: Objects to the assessment of the site as 'Undesirable'. The respondent supports development of the site, flooding and drainage, maintaining use of the public footpaths, and landscape fit can be designed out and the site can contribute to the delivery of housing numbers in the area.

B09/39 Peterculter East 1 (Peterculter)

574, 599: Agree with the assessment of the site as 'Undesirable'. The development would have potential impacts on Camphill School during and after construction, infrastructure and environmental impact concerns (including loss of Green Belt land). Concern raised over risk of precedent and potential of this site enabling further development in the area.

540: Object to the assessment as 'Undesirable'. The site has scored well in the bid assessment checklist and can help to deliver local housing demand. Concerns relating to nature conservation and local impact can be addressed through development design.

B09/40 Peterculter East (Peterculter)

599: Agrees with the assessment of the site as 'Undesirable'. The development would have potential impacts on Camphill School, landscape, visual and environmental impact concerns (including loss of Green Belt/ Green Space Network land) and infrastructure capacity.

540: Objects to the assessment of the site as 'Undesirable'. The site has scored well in the bid assessment checklist and can help to deliver local housing demand. Concerns relating to nature conservation and local impact can be addressed through development design.

B09/41 Peterculter East (Peterculter)

540: Objects to the assessment of the site as 'Undesirable'. The site has scored well in the bid assessment checklist and can help to deliver local housing demand. Concerns relating to nature conservation and local impact can be addressed through development design.

B09/42 Milltimber South (Milltimber)

540: Object to the assessment as 'Undesirable'. The density of the existing opportunity site needs to be increased.

616: Support the assessment of the site as 'Undesirable' and support the current opportunity site allocation for 60 houses and 1,225square metres of ancillary retail / office space.

291, 351, 574, 593, 626: Object to development on the site, including its extant zoning. Concerns over adverse impact of construction on nearby properties, the landscape setting and the environment. Overall objection to development of Green Belt/ Green Space Network land (including risk of coalescence) and implications of development upon infrastructure and services, such as traffic, sewage and education capacity.

291: There are inaccuracies in the proposer's Bid documentation with regards to the planning history of the site and claims of support within the local community.

#### B09/43 Milltimber Farm (Milltimber)

351, 574, 599: Do not support development of the site. There are concerns over loss of Green Belt (risk of coalescence), implications on traffic and road safety, local infrastructure and services (such as healthcare) and overall character and setting of the area. The proposals do not meet density requirements for development. The site should be left as a 'gap' site for potential future road infrastructure at the Milltimber Brae junction.

540: Supports the allocation of the site for 70 units. The site is deliverable and can support overall housing allocations – it scores relatively well on the assessment checklist, and can overcome landscape and visual impact concerns.

#### B09/44 Inchgarth Road (Pitfodels)

029, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 049, 050, 051, 052, 053, 054, 055, 056, 057, 058, 059, 063, 064, 065, 066, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 078, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 090, 091, 092, 093, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 133, 134, 135, 136, 137, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 228, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 288, 289, 290, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 352, 353, 354, 355, 356, 357, 358, 359, 360, 363, 364, 365, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 388, 394, 396, 397, 398, 399, 400, 402, 403, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 418, 419, 420, 423, 424, 425, 443, 447, 452, 458, 474, 475, 539, 574: Support development of the site and disagree with the assessment of 'Undesirable' in the Main Issues Report. Support the proposed formation of a new 'link road', which would improve the road infrastructure, improve road safety and pedestrian/cyclist safety. The proposed housing for the elderly/ retirement housing would meet a need for this demographic. The development would improve the overall environment (unkept vacant site) and enhancing the green space network.

490, 491, 492, 498, 499, 500, 502, 571: Support the 'Undesirable' assessment of Bid 09/44 at Inchgarth Road. The site's is within a Conservation Area and Green Belt, would lead to loss of green space and general adverse impact of development on the character of the area.

B09/45 Shepherd's Retreat (Milltimber)

318, 554, 560, 597, 599: Support the proposal. The project addresses a gap in the market and can support tourism to diversify the local economy, and support existing businesses in the Peterculter area. The use is sympathetic/ appropriate for Green Belt location.

597, 599: The location has limited access for public transport and active travel (walking, cycling) is also limited.

B09/46 Malcolm Road (Peterculter)

422, 495, 536, 537, 578, 599, 630, 631: Support the assessment of the site as 'Undesirable'. The site would impact on the environment, landscape and setting of the site within Green Belt and Green Space Network. Concerns are also raised over the loss of woodland on the site and implications of development upon local services and infrastructure (such as sewers, traffic and education capacity).

536, 537: There are already adequate housing sites allocated in the ALDP.

599: The site is inappropriate but could be acceptable as it is on the main road adjoining the village, would have limited visual impact and could provide some much-needed small houses, despite supporting the 'Undesirable' recommendation. The density policy is not met in the proposals.

B09/47: Binghill House (New Bid) (Milltimber)

618: A new bid for a retirement community comprising residential and care use, and a café on-site.

B09/48 Tillyoch (New Bid) (Peterculter)

557: A new bid for approx. 350 units on land at Tillyoch. The proposals are for 100% affordable housing. The site analysis shows the development is suitable, and respondent suggests the Community Council has identified a need for this type of development in the area. It is noted that the site is well-connected to public transport and employment opportunities.

B09/49 Friarsfield North (New Bid) (Cults)

565: A new bid for approx. 35 units on land at Friarsfield North (Sunnyside). The land is adjacent to the existing OP41 Friarsfield site and has Core Path connectivity (CP87).

## **Hazlehead/Ashley/Queens Cross**

### B10/01: Dobbies

555: Object to the 'Undesirable' recommendation for proposed residential development. The respondent has enclosed an Ecological Constraints and Opportunities Plan in support of the proposals, noting the site is not a conforming use in the Green Belt making it an opportunity for development

### B10/03 Phase 1 North East Countesswells

138, 422, 574: Support the assessment of the site as 'Undesirable'. Common reasons for this include concerns over environmental impacts such as loss of Green Belt, severance of Green Space Network, harm to wildlife and tree loss. There are concerns over traffic impacts at A944 and Skene Road. It is also noted that the density requirements for development are not met.

261: Notes the presence of red squirrels

610: Does not agree with the assessment of the site as 'Undesirable'. Proposed road upgrades to A944 Jessiefield Junction and the extant planning status of the site with the Countesswells Development Framework would allow for further development. There is no adverse landscape impact and the site is well-connected to local amenities and public transport. Green Belt/ Green Space Network designation is not adequate justification for not releasing land for planned growth, There are possible opportunities for strengthening the Green Space Network through the design of the site.

### B10/04 Jessiefield and Smithfield

138: Agree with the assessment of the site as 'Undesirable'. It is noted that the site's location in close proximity to the crematorium (and planned expansion) is not appropriate. Part of the site is also zoned as Green Space Network and potential development, when considered cumulatively with Maiden Craig, will impact the setting of the Den of Maiden Craig Nature Reserve.

### B10/05 Bellfield Farm

138, 574: Agree with the assessment of the site as 'Undesirable'. Development in the Green Belt is not supported as it risks coalescence between Countesswells and Kingswells. There is also concern over the potential landscape impact of development in this location. Additional homes will also have impact on road network. Proximity to the Crematorium site is also noted.



## **Torry/Ferryhill**

### B12/02 North Dee Quarter/Harbour City

482: Respondent supports inclusion of this area as a 'live/work' quarter in the Local Development Plan. It is identified as an Intervention Area in the City Centre Masterplan, proposing a residential-led mix of uses, re-use of existing buildings and improving infrastructure. The site is well-connected to transport links and community facilities. A transport statement is also provided.

### B12/03 – Former Torry Nursery

544: Requests site to be considered for health care use in the next local development plan.

### B12/04 South Harbour Part One (New Bid)

486: A new bid for re-zoning of land at OP62: South Harbour Aberdeen. A number of land parcels are put forward for development/ intervention areas within the Bay of Nigg Framework, located at South Harbour, Altens and East Tullos and North Harbour. It is noted that existing land allocations (i.e. Green Belt/ Green Space Network) could restrict delivery of the Framework and potential expansion of the Harbour, so re-zoning is necessary.

## **Kincorth/Loirston**

### B13/01 – Blackhills of Cairnrobin

518: Agrees with the assessment of the site as 'Undesirable'.

### B13/04 Craighill

484: Does not agree with the assessment of the site as 'Undesirable'. The site is deemed to be a modest expansion of current development site OP59, and infrastructure is considered and planned within OP59. The site is also outwith the Kincorth Hill Local Nature Conservation Site area.

### B13/05 – Peterseat Drive

541: Does not agree with the assessment of the site as 'Undesirable'. The site would help to deliver employment land, in line with the objectives of the Strategic Development Plan of making the region more economically attractive. Comments also include the zoning of the site within Green Belt is unnecessary and its allocation for development would not impact on the area. Respondent notes the site is deliverable within a short timescale.

### B13/08 Royal Devenick Park

271, 387, 392, 393, 401, 404, 417, 435, 436, 437, 438, 439, 440, 441, 442, 444, 449, 450, 453, 454, 455, 461, 463, 464, 465, 467, 468, 470, 479, 556, 558, 561, 622: Agree with the assessment of the site as 'Undesirable'. Reasons include; erosion of the Green Belt, threat to

wildlife and biodiversity (including protected species), detrimental impact to the landscape setting of Aberdeen within a designated prime landscape area and Local Nature Conservation Site and potential impacts on River Dee Special Area of Conservation as a result of run-off from construction/ development. Site also comprises semi-natural and ancient woodland which is threatened. Comments also suggest that existing housing developments should be built out before considering further sites. Some comments refer to the unsuitable location of further residential development, lack of public transport and services and unsuitable design of proposals.

#### B13/09 Rigifa Farm Area 1

496: Does not agree with the assessment of the site as 'Undesirable'. The site should be allocated for 100 units and may be considered as a joint development as B13/10. Up to 50% of the units may be delivered as affordable housing. Respondent makes comment relation to landscape fit, land use mix, land use conflict and infrastructure capacity.

518: Agrees with the assessment of the site as 'Undesirable'. The location close to Blackhills Quarry is noted.

#### B13/10 – Rigifa Farm

496: Does not agree with the assessment of the site as 'Undesirable'. The site should be allocated for 164 units and commercial development. Up to 50% of the units may be delivered as affordable housing. Respondent makes comment in relation to; flood risk, landscape fit, land use mix, land use conflict and infrastructure capacity.

518: Agrees with the assessment of the site as 'Undesirable'. The location close to Blackhills Quarry is noted.

#### B13/11 Rigifa Farm (Area 3)

496: Does not agree with the assessment of the site as 'Undesirable'. The site should be allocated for 40 units and may be considered as a joint development as B13/10. Up to 50% of the units may be delivered as affordable housing. Respondent makes comment in relation to; landscape fit, land use mix, land use conflict and infrastructure capacity.

518: Agrees with the assessment of the site as 'Undesirable'. The location close to Blackhills Quarry is noted.

#### B13/14 – Leggart Brae (New bid)

547: A new bid for around 150 residential units subject to full masterplanning process in conjunction with the identified Parkland surrounding the Leggart Burn.

#### B13/15 – Wellington Road (New bid)

421: Rezoning from Business and Industrial to mixed use/ General discussion of employment land in Aberdeen to support rezoning.

B13/16 – Mains of Charleston (New bid)

485: A new bid comprises 6 plots split over Aberdeen City and Aberdeenshire Council local authority areas. 4 areas are within Aberdeen City area. It had good transport links, is at the edge of settlements, and is low density. Proposal is to remove the site from the green belt, and promote it as a potential development opportunity for alternative uses. Alternative uses could be

- Renewable energy
- Outdoor recreational uses / facilities
- Tourism related development
- Carehome / additional needs housing
- Bespoke housing
- Garden centre

Site would support the above and/or these types of uses as part of a mixed use development

B13/17 South Harbour Part Two (New Bid)

486: A new bid for re-zoning of land surrounding OP62: South Harbour Aberdeen. A number of land parcels are put forward for development/ intervention areas within the Bay of Nigg Framework, located at South Harbour, Altens and East Tullos and North Harbour. It is noted that existing land allocations (i.e. Green Belt/ Green Space Network) could restrict delivery of the Framework and potential expansion of the Harbour, so re-zoning is necessary.

B13/18 South Harbour Part Three (New Bid)

486: A new bid for re-zoning of land surrounding OP62: South Harbour Aberdeen. A number of land parcels are put forward for development/ intervention areas within the Bay of Nigg Framework, located at South Harbour, Altens and East Tullos and North Harbour. It is noted that existing land allocations (i.e. Green Belt/ Green Space Network) could restrict delivery of the Framework and potential expansion of the Harbour, so re-zoning is necessary.

B13/19 South Harbour Part Four (New Bid)

486: A new bid for re-zoning of land at OP62: South Harbour Aberdeen. A number of land parcels are put forward for development/ intervention areas within the Bay of Nigg Framework, located at South Harbour, Altens and East Tullos and North Harbour. It is noted that existing land allocations (i.e. Green Belt/ Green Space Network) could restrict delivery of the Framework and potential expansion of the Harbour, so re-zoning is necessary.

## Summary of response by planning authority:

### Deeside

#### B09/01 Culter House Road Phase 2

442, 574: Support for the undesirable status of the site is noted and welcomed.

519: The site currently plays a valuable role in its environmental designations as Ancient Woodland, Green Belt and Green Space Network. The site is identified as Ancient Woodland which is identified by SNH – if the respondent believes the site does not merit this status then the relevant agency should be consulted. The site is also within the River Dee Catchment Area. Loss of this site would erode the character of the natural environment in this area. The location is remote from local amenities, meaning it would be car dependent, and its situation within the Dee Valley landscape area would lead to an adverse visual impact on the landscape character. The reasons for the Undesirable recommendation are upheld.

#### B09/03 – West Craigton Farm

536, 537, 578, 599, 630, 631: Support for the undesirable status of the site is noted. It is recommended that the site be retained as Green Belt.

#### B09/04 Countesswells Woods

574: Support for the undesirable status of the site is noted and welcomed.

100, 219, 220, 221, 222, 223, 224, 225, 229, 546, 548: The site scored well in some aspects. However, according to the Proposed Strategic Development Plan, new allocated sites should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise (in this case Countesswells). Because of this, the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan.

100: When considered in isolation from the emerging Countesswells development, this site is remote from (existing) amenities and is not well-served by public transport. The proposal for this residential-only development would not contribute to a greater mix of uses in this area given the predominance of residential development already in the area.

#### B09/05 Culter House Road

422, 574: Support for the undesirable status of the site is noted and welcomed.

535: The development is not supported due to its location on land identified as Ancient Woodland, Green Belt and Green Space Network. Ancient Woodland status is identified by SNH and so any dispute with regards to that designation on this site should be raised with the relevant agency. It is also located in the Dee Valley landscape character area where the proposed development would erode the pattern characteristic to the area. The addition of the proposed residential units to this area would not contribute a better land use mix in this largely rural area which, albeit dispersed, also has existing residential units. The site is not

well-served by any of the Deeside settlements in this location; public transport services and local amenities are remote and so it is not desirable for development. The reasons for the Undesirable recommendation are upheld.

#### B09/06 Contlaw

422, 476, 574, 599: Support for the undesirable status of the site is noted and welcomed.

525: The site is currently designated Green Space Network and is host to areas of woodland and priority habitat to a variety of species, including Designated Species. As part of the Green Belt, development of this site at this scale would erode the role of the Green Belt in protecting the character and setting of the city and its settlement. Some parts of the site are also known to be at risk of flooding. This scale of development is not required in this Plan, as identified by the Proposed Strategic Development Plan. The reasons for the Undesirable recommendation are upheld.

#### B09/07 – Albyn Playing Fields

422, 574, 599: Support for the undesirable status of the site is noted and welcomed.

545: The location of the site between two settlements, Peterculter and Milltimber, means that it is not well-served by either for availability of local amenities. The site forms part of the Green Belt and Green Space Network, which is important in preventing coalescence of these settlements. Development of this site would erode the Green Belt in this way and have an adverse impact on the character of the area. The Proposed Strategic Development Plan suggests that small-medium scale sites on brownfield land will contribute to sustainable growth in the area; therefore the Bid would be contrary to this.

#### B09/08 Countesswells

422, 574: Support for the undesirable status of the site is noted and welcomed.

386: According to the Proposed Strategic Development Plan, new allocated sites should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise (in this case Countesswells). Because of this, the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan. When considered in isolation from the emerging Countesswells development, this site is remote from amenities and is not well-served by public transport. Its environmental status as a LNCS (Foggieton), Green Belt and Green Space Network and Ancient Woodland also contribute toward an Undesirable outcome.

#### B09/09 Pineacres Contlaw Road

574: Support for the undesirable status of the site is noted and welcomed.

608: Notwithstanding the environmental value of the site as Green Space Network, established woodland and priority habitat, the green belt zoning is unsuitable as a result of the extant OP112 site allocation and it is considered that a residential zoning is more

appropriate. The existing area of Green Space Network should however remain in order to protect these environmental assets and ensure access to the natural environment and connectivity between them.

The citation of Ancient Woodland in the site assessment a reference to the Ancient Woodland Inventory Scotland; its category as long-established is extraneous. Ancient Woodland status is identified by SNH and so any dispute with regards to that designation on this site should be raised with the relevant agency.

#### B09/10 Friarsfield North

422, 506, 522, 572, 574: Support for the undesirable status of the site is noted and welcomed.

565: Friarsfield North is located in an area of Green Belt which is important in maintaining the separate identities of Cults, Countesswells and Aberdeen, which would be at risk if the area were developed. The settlements along Deeside are contained within the 90m contour line and Friarsfield North would exceed this. Notwithstanding, the Strategic Development Plan has set out that new Plan allocations should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise. Because of this, the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan. The reasons for the Undesirable recommendation within the Bid assessment are upheld.

#### B09/11 Land at Culter House Road

422, 615, 574, 599: Support for the undesirable status of the site is noted and welcomed.

615: The site remains Undesirable for development. The location is isolated from either Peterculter or Milltimber settlements and would be car dependent. The site is located on land zoned as Green Belt and Green Space Network which serves to maintain the separate identities of Milltimber and Peterculter. This green belt function has become even more important with the development of the AWPR. The reasons for the Undesirable recommendation are upheld.

#### B09/12 Craigton Road South 1

422, 574: Support for the undesirable status of the site is noted and welcomed.

583: The site is zoned as Green Belt, Green Space Network, which plays an important role in separating the settlements of Aberdeen and Cults. It also contains many mature trees and has an established wildlife and recreational function. The site is within the Pitfodles Conservation Area. The site remains Undesirable for the proposed development.

#### B09/13 Craigton Road South 2

422, 574: Support for the undesirable status of the site is noted and welcomed.

583: The site is zoned as Green Belt, Green Space Network, which plays an important role in separating the settlements of Aberdeen and Cults. It also contains many mature trees and has an established wildlife and recreational function. The site is within the Pitfodles Conservation Area. The site remains Undesirable for the proposed development.

#### B09/14 Craigton Road South 3

422: Support for the undesirable status of the site is noted and welcomed.

583: The site is zoned as Green Belt, Green Space Network, which plays an important role in separating the settlements of Aberdeen and Cults. It also contains many mature trees and has an established wildlife and recreational function. The site is within the Pitfodles Conservation which falls within the Dee Valley Landscape Character Area. The Valley is one of the defining and distinctive features of Aberdeen, with a primary characteristic comprising a series of historic settlements, separated by clear areas of pasture and woodland, one of which is Pitfodles. The site remains Undesirable for the proposed development.

#### B09/15 Land at Sunnyside

574: Support for the undesirable status of the site is noted and welcomed.

611: The Undesirable status of the site is upheld. The site is located next to a major development site being built out for residential development. Development of this site would further erode the Green Belt landscape of the area and is not required in proximity to the adjacent site.

#### B09/16 Craigton

536, 537, 578, 599, 630, 631: Support for the undesirable status of the site is noted and welcomed.

611: Development on this site would (without mitigation measures) adversely impact upon the surrounding landscape. Development in this location would be isolated to the main settlement of Peterculter and it is not well connected to services and facilities. The site is within the Green Belt and development would erode the function of the Green Belt.

#### B09/17 Land at Inchgarth Mews, Cults

574: Support for the undesirable status of the site is noted and welcomed.

611: The reasons for the Undesirable status of the site are upheld. Development on this site would impact on the surrounding landscape, and any development would only be partially related to the main settlement of Cults. The area - as Green Belt and Green Space Network - helps to maintain the separate identities of Cults and Aberdeen and the overall landscape setting of the city. The location is also close to an LNCS (River Dee Corridor).

#### B09/18 Mill of Brotherfield

574: Support for the undesirable status of the site is noted and welcomed. It is recommended that the site remain as Green Belt.

#### B09/19 – Land at Craigton Road

522, 574: Support for the undesirable status of the site is noted and welcomed. It is recommended that the site remain as Green Belt.

#### B09/20 Binghill Farm

574: Support for the undesirable status of the site is noted and welcomed.

617: The reasons for the Undesirable justification are upheld. There is no requirement for the allocation of a site of this nature. The location is deemed unsuitable due to; erosion of Green Belt and Green Space Network, visual impact of breaching the Deeside Valley contour line, and reliance on car travel. Supplementary Guidance for the Oldfold development site explains the significance of not breaching the skyline within the contour.

Oldfold SG – para 2.2 and map - The extent to which the settlements have extended north away from the historical core on the Deeside Road is also clearly defined by the topography with minimal development beyond 95m AOD (95m contour identified on the plan opposite). By keeping development below this elevation there is generally minimal impact upon the landscape context and no development along the skyline.

#### B09/21 Countesswells Expansion

422, 516, 574: Support for the undesirable status of the site is noted and welcomed. The allocation of the site is likely to be contrary to the Proposed Strategic Development Plan and the Undesirable recommendation is upheld.

#### B09/21 Countesswells Expansion Sites 4, 5, 6

610: There would be an unacceptable adverse impact upon the landscape as a result of the proposed development, resulting in an isolated development in the Green Belt, undermining the separation between Cults and the western edge of Aberdeen.. They would not relate well either to the main Countesswells site or to the rural character of the surrounding area. The site's unsuitability has been previously noted by the Reporter during the Examination of the adopted 2017 Plan. Further, should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise (in this case Countesswells). Therefore the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan

#### B09/21 Countesswells Expansion Sites 2, 3, 7



506, 572: Support for the undesirable status of the site is noted and welcomed. It is recommended that an expansion of Countesswells is not appropriate at this time and the site is retained as Green Belt and Green Space Network.

#### B09/22 Land at West Craigton / Blaircara Village

422, 503, 536, 537, 578, 599, 630, 631: Support for the undesirable status of the site is noted and welcomed. The site's natural value is recognised and it is recommended that the site remains as present.

318, 554, 560, 600: Reasons for the Undesirable recommendation are upheld. The site scored well on a few criteria; however the proposed development is unsuitable for the location and it would have an adverse impact on the landscape. The site is not well-related to the nearest settlement (Peterculter) so would be car depended and not accessible by a range of sustainable transport modes. The specialist facilities proposed would be required to be served by such a range of transport modes. Further, environmental factors such as the Culter Burn LNCS, River Dee SAC and Culter Burn SAC are in proximity of the site; as well as its Green Belt/ Green Space Network zoning. Protected species have also been raised as a potential issue.

#### B09/23 Hillhead of Pittfodels

422, 574: Support for the undesirable status of the site is noted and welcomed. It is recommended that the site be retained as Green Belt.

#### B09/24 Land at Loirsbank Road

574: Support for the undesirable status of the site is noted and welcomed. The environmental factors associated with the site have been considered and upheld.

541: The environmental reasons in support of the Undesirable recommendation remain; there is risk of flooding on the site which would lead to flood and drainage issues for any future development. Guidance from SEPA and Scottish Planning Policy advises against development on, or close to, functional flood plains.

#### B09/25 Highview House, Countesswells

574: Support for the undesirable status of the site is noted and welcomed.

520: Development of this site will erode the function of the Green Belt in protecting the setting and character of the city and its settlements, and preventing coalescence. The site itself is not accessible by a range of transport options so would be car-dependent and local amenities are not in close proximity. There is no requirement for sites of this nature in the Plan as set by the Strategic Development Plan and sites such as this are likely to be contrary to it.

#### B09/26 Huxterstone

422, 574: Support for the undesirable status of the site is noted and welcomed.

568: Green Belt is valuable in preserving the setting and character of the city's landscape, and its suburbs. Development of this site would erode this purpose. The location is not described as a 'development corridor' in this Plan. Development in this location is not supported.

#### B09/27 Contlaw Road

514, 574: Increasing the capacity of development on the site would result in intensification of use on the land, impacting on the overall character of the site and its location. There would also be implications on the site as a result, such as drainage and flood risk, traffic and accessibility, and bigger impact on school roll capacity. The potential loss of woodland is also deemed to be unacceptable as a result of the increased capacity. It is therefore recommended that the site be retained as allocated, for 10 units.

#### B09/28 Land West of Malcolm Road

536, 537, 578, 599, 630, 631: Support for the undesirable status of the site is noted and welcomed. It is recommended that the site be retained as Green Belt.

514: The site scored reasonably well on a number of criteria. However, its location remains unsustainable in terms of accessibility by a range of transport modes, proximity to local amenities and employment locations.

#### B09/29 Guttrie Hill West

599, 74: Support for the undesirable status of the site is noted and welcomed. Following assessment of the site it is recommended that its Green Belt and Green Space Network status remains.

389: Aberdeen City and Shire Strategic Development Plan 2014 as well as Aberdeen City's Local Transport Strategy 2016-2021 advocate support for, and greater numbers of, ultra-low and low emission vehicles. We note the support for alternative sustainable fuel opportunities and largely agree with the benefits of such opportunities for Aberdeen. However the introduction of a refuelling station at this location as proposed is not supported as it is first and foremost a fossil fuel station with electric vehicle charging points as a secondary service.

#### B09/30 Guttrie Hill East

599, 74: Support for the undesirable status of the site is noted and welcomed. Following assessment of the site it is recommended that its Green Belt and Green Space Network status remains.

389: Aberdeen City and Shire Strategic Development Plan 2014 as well as Aberdeen City's Local Transport Strategy 2016-2021 advocate support for, and greater numbers of, ultra-low and low emission vehicles. We note the support for alternative sustainable fuel opportunities and largely agree with the benefits of such opportunities for Aberdeen. However the introduction of a refuelling station at this location as proposed is not supported as it is first and foremost a fossil fuel station with electric vehicle charging points as a secondary service.

#### B09/31 Friarsfield Woodley

574: supports undesirable recommendation notes reasons including; unnecessary development, Friarsfield access already set out in the Development Framework

574: Support for the undesirable status of the site is noted and welcomed. It is recommended that the site is retained as Green Belt and Green Space Network.

#### B09/32 Hillhead of Countesswells

609: respondent supports this bid; does not believe there is impact on the Green Belt or the environment and would help deliver housing in the area as a suitable land release site. The respondent disagrees with the bid assessment scoring of the site.

574: respondent does not support development on the site; notes that the site is poorly located to Cults and City in terms of public transport and amenities, loss of trees, sporadic in rural context

574: Support for the undesirable status of the site is noted and welcomed.

609: The site scored well in a number of criteria. It is not deemed to be supported in areas relating to accessibility or proximity to local amenities; these factors remain applicable as assessed. Development at this location would therefore appear sporadic and would undermine the overall role of the Green Belt. The recommendation is therefore upheld.

#### B09/33 Damhead Cadgerford (Westhill / Kingswells)

034, 095, 574: Support for undesirable designation of the site is noted and welcomed.

487: Development in this area would be detrimental to the green belt function. The site is part of the open countryside which separates Kingswells from Westhill and serves to maintain their separate identities and landscape setting. The development on its own does not relate well to the settlement of Westhill. Constraints including the major pipeline on site and flooding from the Brodiach Burn are considered within the proposed masterplan document but still require to be noted as part of any site assessment.

#### B09/34 Kennerty Farm (Peterculter)

599: Support for undesirable designation of the site is noted and welcomed. The site is located on the green belt and green space network, with Burnside Road is an easily identifiable and logical green belt boundary is this area.

B09/35 Newmill Hill (Peterculter)

599: Support for undesirable designation of the site is noted and welcomed.

540: The site is an area of green belt which provides setting for Peterculter. Development would be likely to have significant impact on the surrounding landscape and may have a negative effect on the spaces and habitats of the Culter Burn Local Nature Conservation Site, which abuts the eastern side of the site. The site poorly related to the existing settlement of Peterculter, the Culter Burn Local Nature Conservation Site form a strong boundary to the edge of the existing settlement.

B09/36 Treespark 1 (Pitfodels)

540: Support for undesirable designation of the site is noted and welcomed.

574: The site is located in the green belt separating Cults from the main urban area of Aberdeen. The site is within the Pitfodels conservation area, which is characterised by open fields and properties within large plots. The site also lies within the Dee Valley landscape character area which comprises a series of historic settlements, separated by clear areas of pasture and woodland, one of which is Pitfodels.

B09/37 Treespark 2 (Pitfodels)

540: Support for undesirable designation of the site is noted and welcomed.

574: The site is located in the green belt separating Cults from the main urban area of Aberdeen. The site is within the Pitfodels conservation area, which is characterised by open fields and properties within large plots. The site also lies within the Dee Valley landscape character area which comprises a series of historic settlements, separated by clear areas of pasture and woodland, one of which is Pitfodels

B09/38 Lovers' Walk (Peterculter)

574, 599: Support for undesirable designation of the site is noted and welcomed.

540: The site is within the green belt and green space network. The site abuts the River Dee Special Area of Conservation on its southern boundary and abuts, on the south and north boundary, the River Dee Corridor and Deeside Old Railway local nature conservation sites respectively. The site is within the River Dee landscape character area, a defining landscape feature for the setting of Aberdeen.

B09/39 Peterculter East 1 (Peterculter)

574, 599: Support for undesirable designation of the site is noted and welcomed.

540: The site is within the green belt and is green space network. The site is located in close proximity to the River Dee Special Area of Conservation and the abuts the Old Deeside Line Local Nature Conservation Site. The site serves to separate Peterculter and Milltimber, allowing them to maintain their individual identities, an important function now the Aberdeen Western Peripheral Route is open.

B09/40 Peterculter East (Peterculter)

599: Support for undesirable designation of the site is noted and welcomed.

540: The site is within the green belt and is green space network. The site is located in close proximity to the River Dee Special Area of Conservation and the abuts the Old Deeside Line Local Nature Conservation Site. The site serves to separate Peterculter and Milltimber, allowing them to maintain their individual identities, an important function now the Aberdeen Western Peripheral Route is open.

B09/41 Peterculter East (Peterculter)

540: The site is within the green belt and is green space network. The site is located in close proximity to the River Dee Special Area of Conservation and the abuts the Old Deeside Line Local Nature Conservation Site. The site serves to separate Peterculter and Milltimber, allowing them to maintain their individual identities, an important function now the Aberdeen Western Peripheral Route is open.

B09/42 Milltimber South (Milltimber)

540: The site was allocated for development during the Reporters Report into the 2017 ALDP. The Reporter stated sensitive design and landscaping where required as the site is within a sensitive location. The current allocation of 60 houses and 1,225square metres of ancillary retail / office space on a larger site may allow development to be configured in a way which maintain views. Increasing the allocation may compromise this situation.

616: Support for undesirable designation of the site, and the existing allocation is noted and welcomed.

591, 351, 574, 593, 626: The site was allocated for development during the Reporters Report into the 2017 ALDP. It was noted development would alter the landscape character of the area from semi-rural to leafy suburbia but it would not help to prevent coalescence as the site is surrounded on three sides by Milltimber, would add services and facilities to the area, and education constraints could be mitigated. On balance, the Reporter noted with sensitive design and landscaping, the development would appear as a natural extension of Milltimber and would blend well with its surroundings.

291: The claims of inaccuracy are noted.

B09/43 Milltimber Farm (Milltimber)

351, 574, 599: Support for undesirable designation of the site is noted and welcomed.

540: The site located within the green belt and green space network. The area provides an important landscape and green belt function; to separate Peterculter and Milltimber, allowing them to maintain their individual identities, an important function now the Aberdeen Western Peripheral Route is open.

#### B09/44 Inchgarth Road (Pitfodels)

029, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 049, 050, 051, 052, 053, 054, 055, 056, 057, 058, 059, 063, 064, 065, 066, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 078, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 090, 091, 092, 093, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 133, 134, 135, 136, 137, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 228, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 288, 289, 290, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 352, 353, 354, 355, 356, 357, 358, 359, 360, 363, 364, 365, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 388, 394, 396, 397, 398, 399, 400, 402, 403, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 418, 419, 420, 423, 424, 425, 443, 447, 452, 458, 474, 475, 539, 574: Support for the allocation of the site is noted. The site plays an important role in separating the settlements of Aberdeen and Cults, and falls within the Pitfodels Conservation Area. The Conservation Area character and appearance is largely made up of open fields and properties within large plots, often bounded by woodlands.

The area falls within the Dee Valley Landscape Character Area. The Valley is one of the defining and distinctive features of Aberdeen, with a primary characteristic comprising a series of historic settlements, separated by clear areas of pasture and woodland, one of which is Pitfodels.

The site is zoned as Green Belt, Green Space Network, and a Tree Preservation Order covers the site. The slope within the site has a gradient greater than one in twelve and the site is bisected by the local nature conservation site and core path, the Deeside Line. There has not been sufficient evidence to outweigh that original assessment and therefore remains in place. Planning permission in principle (PP181224) for 'Residential led development for the retired/elderly (including affordable housing), a 50 bedroom care home and approximately 500sqm of ancillary retail/community use, together with public open space and associated infrastructure including a link road' was submitted to Aberdeen City Council in July 2018. The planning application is still to be assessed at present.

490, 491, 492, 498, 499, 500, 502, 571: Support for undesirable designation of the site is noted and welcomed.

#### B09/45 Shepherd's Retreat (Milltimber)

318, 554, 560, 597, 599: The support for the site is noted. The proposal will be located in the greenbelt and could have a visual impact on the skyline and be prominent in the landscape without sufficient mitigation. There is limited access to public transport or for active travel. The development will be car dependant, therefore potentially increasing vehicular traffic along Malcolm Road (B979) and other unnamed roads in the area. On site provision of shops, cafes and restaurants would not support the neighbourhood centre of Peterculter.

#### B09/46 Malcolm Road (Peterculter)

422, 495, 536, 537, 578, 599, 630, 631: Support for undesirable designation of the site is noted and welcomed.

536, 537: Housing allocation and the requirement for housing is discussed under Issue 2.

599: The site would be located on the green belt and green space network. The site is steep and is ancient woodland designation. The site is remote from local facilities and bus stops with a poor standard of the footway leading south.

#### B09/47: Binghill House (New Bid) (Milltimber)

618: The site is located on the Green Belt and Green Space Network zonings. Access to public transport facilities and community facilities is limited. The site is located in the Dee Valley, development should not negatively impact on the undeveloped upper slopes of the Dee Valley or its skyline; as such developments/urban extensions should be located below the 95 meter contour line. There will be some potential loss or disturbance to landscape features (trees) during construction and post construction period. A proposal of application notice (190857) was submitted in May 2019 covering this site and site B09/20 (Binghill House).

#### B09/48 Tillyoch (New Bid) (Peterculter)

557: The proposal is located on the green belt, and within the greenspace network. The existing equine and cattery business are acceptable uses for the greenbelt. The site contains and abuts ancient woodland and although the proposer indicates the woodlands would be retained, development will pose a threat during and post construction. Significant upgrades will be required to school and road infrastructure to accommodate the development. With regard to land use mix, residential within a residential area does not diversity the land use, however the proper indicated the development will be 100% affordable housing, with 10% accessible housing. OP109: Woodend Farm (19 houses) is included within the site. The existing ALDP notes a drainage impact assessment is required as there are wet habitats/woodland adjacent to the site, potential buffer to prevent increase in drainage of wet habitats/woodlands. Ancient woodland to the south is to be protected.

#### B09/49 Friarsfield North (New Bid) (Cults)

565: The site is located in an area of green belt which acts as setting to the existing development and Aberdeen as a whole. It is part of an area which serves to maintain the separate identities of Cults, Countesswells and Aberdeen. The bid site would effectively link OP38 (Countesswells) and OP41 (Friarsfield). The site sits higher on the landscape. Development would have significant impacts on landscape and would be highly visible from the south. The settlements along Deeside are contained within the 95m contour line and the development would go beyond this. The development is poorly located to public transport and community facilities, therefore would be car dependent.

#### **Hazlehead/Ashley/Queens Cross**

##### B10/01: Dobbies

555: The site is located on the Green Belt and Green Space Network zonings. the proposal would likely have a significant impact upon nature conservation, resulting in the loss/ disturbance of wildlife habitat and species. The proposal would sever the Green Space Network in this location and would pose threats to Ancient Woodland surrounding the site, both during and post construction. There may also be flooding and drainage issues. Developer suggests a lower number of units could be accommodated, possibly 49, with the exact number being determined through an ecological appraisal. There no circumstantial change to the assessment with a lower density housing figure.

##### B10/03 Phase 1 North East Countesswells

138, 422, 574: Support for undesirable designation of the site is noted and welcomed.  
261: The site assessment notes there are a significant number of designated species within and just outwith the site boundary.

610: The site is currently zoned as green belt and green space network. The proposal would have a significant impact upon nature conservation, resulting in the loss/ disturbance of wildlife habitat and species. The proposal would sever the green space network in this location and would pose threats to natural designations within and surrounding the site, both during and post construction. The site is an extension to OP38 Countesswells, a long term development site for 3000 homes and 10 hectares of employment land. OP38 is contained within a natural low lying 'bowl' in the landscape, with the northern areas being more elevated. The Countesswells (OP38) allocation is anticipated to build out at a rate of about 175 units per year and is not expected to be completed until post 2026. The facilities to support OP38 will be developed at an appropriate rate to the housing.

##### B10/04 Jessiefield and Smithfield

138: Support for undesirable designation of the site is noted and welcomed.

##### B10/05 Bellfield Farm

138, 574: Support for undesirable designation of the site is noted and welcomed.



## **Torry/Ferryhill**

### B12/02 North Dee Quarter/Harbour City

482: The site area is currently zoned as special employment and is host to a number of business and industrial units. A number of these buildings are Listed and contribute to the traditional fabric of the City Centre and harbour. The site lies outside of the ALDP City Centre boundary but within the Aberdeen City Centre Masterplan boundary. It is considered that the site should be developed in line with the City Centre Masterplan. This area should be retained to allow business uses to grow close to the city centre. The zoning of the site will remain special employment. It is accepted that an appropriate mix of compatible new uses would be required to create a highly desirable urban business district, which could include Class 1 (Retail), Class 2 (Financial, Professional and other services), Class 3 (Food and Drink), Class 4 (Business, including new office development and a Global Energy Hub if required), and Class 9 (Residential).

### B12/03 – Former Torry Nursery

544: The site is currently zoned as OP103: Former Torry Nursery School, and is a Council owned site surplus to requirement. The site is within a residential zoning. The site is also suitable for a number of other uses such as community based activities or residential use. These should not be excluded as possible uses for the site.

### B12/04 South Harbour Part One (New Bid)

486: The proposal is to allocate land for the expansion of the south harbour for port-related activity, including tourism, marine and other industrial activity. Four parcels of land are identified; Site A is a parcel of land between St Fittick's Road and Greyhope Road, Site B comprises Walker Park, Site D runs along Greyhope Road to the south of Balnagask Golf Course, Site C is Greg Ness.

The sites comprise a mix of zonings including Green Belt, Green Space Network, undeveloped and developed coast, and harbour.

The area is experiencing significant modification due to the development on the Bay of Nigg, where the new Aberdeen South Harbour is proposed. The sites are all subject to existing temporary planning consents relating to work at the new harbour. The coast is a distinctive and defining feature of Aberdeen; although Bay of Nigg is being altered at present the surrounding cliffs are still an important landscape feature.

The sites have strong recreational value, a strong nature conservation and built heritage value. The sites are remote from existing facilities and not all are easily accessible by public transport. The development of the sites would be located in close proximity to the new South Harbour, ensuring future development is sustainably located.

## **Kincorth/Loirston**

### B13/01 – Blackhills of Cairnrobin

518: Support for undesirable designation of the site is noted and welcomed.

### B13/04 Craighill

484: The site is located within green belt and the green space network. Development on this site would be located in proximity of the Kincorth Hill Local Nature Conservation Site / Local Nature Reserve and would have adverse impact on the natural environment setting. Development located here would be poorly related to either Cove or Kincorth settlements; it is poorly located in terms of public transport provision, community facilities and other amenities, and would therefore be car dependent. The site abuts the northern edge of Loirston (OP59) a long term development site of 1500 homes and 11 hectares of employment land. The Loirston (OP59) allocation is anticipated to start development in 2021, with a build out at a rate of about 150 units per year from 2023 and is not expected to be completed until post 2026. The facilities to support OP59 will be developed at an appropriate rate to the housing.

### B13/05 – Peterseat Drive

541: The site proposes land for employment uses adjacent to the existing Business & Industrial area and is currently zoned as green belt. The site would act as an extension to the existing Peterseat Industrial Estate. There are a number of sites around the City that are allocated for development for employment uses.

### B13/08 Royal Devenick Park

271, 387, 392, 393, 401, 404, 417, 435, 436, 437, 438, 439, 440, 441, 442, 444, 449, 450, 453, 454, 455, 461, 463, 464, 465, 467, 468, 470, 479, 556, 558, 561, 622: Support for undesirable designation of the site is noted and welcomed.

### B13/09 Rigifa Farm Area 1

518: Support for undesirable designation of the site is noted and welcomed.

496: The site is located in the green belt. Blackhills Quarry sits within 400m of the site and this may have land use conflict issues (quarry blasting), especially as the development proposed is residential. Proposals within the locale have been subject to examination within the reporters report for the 2017 and 2012 ALDP's.

### B13/10 – Rigifa Farm

518: Support for undesirable designation of the site is noted and welcomed.

496: The site is located in the green belt. Blackhills Quarry sits within 400m of the site and this may have land use conflict issues (quarry blasting), especially as the development

proposed is residential. Proposals within the locale have been subject to examination within the reporters report for the 2017 and 2012 ALDP's.

#### B13/11 Rigifa Farm (Area 3)

518: Support for undesirable designation of the site is noted and welcomed.

496: The site is located in the green belt. Blackhills Quarry sits within 400m of the site and this may have land use conflict issues (quarry blasting), especially as the development proposed is residential. Proposals within the locale have been subject to examination within the reporters report for the 2017 and 2012 ALDP's.

#### B13/14 – Leggart Brae (New bid)

547: The site is located in an area of green belt and green space network which acts as a natural setting to Aberdeen City and Aberdeenshire. Development would have undesirable impacts on landscape and natural environment. Though adjacent to residential development the site is not well-related due to topography and landscape design; it is poorly located to public transport and community facilities, therefore would be car dependent.

#### B13/15 – Wellington Road (New bid)

421: The site is located within a prominent corner of the Altens Industrial Estate, close to the brow of a hill, and on a main road transport corridor. The previous use on site was a motel; this has been demolished. The current zoning allows for facilities that directly support business and industrial uses where they enhance the attraction or sustainability of the city's business and industrial land, and should be primarily aimed at meeting the needs of businesses and employees within the business and industrial area. The Wellington Road forms a strong boundary to separates business and industrial use from residential use to the west. Rezoning the site would create an isolated island of mixed use zoning, within the wider business and industrial zoning.

#### B13/16 – Mains of Charleston (New bid)

485: The site is located in an area of green belt which acts as setting to Aberdeen as a whole. It is part of an area which serves to maintain the boundary of Aberdeen City and Shire, particularly as a buffer on either side of the A92. The bid site would effectively develop to the administrative boundary eastwards to OP53 (Aberdeen Gateway) and OP55 (Blackhills Quarry). Though zoned as green belt, part of the bid site falls within the existing OP60 (Charleston) site, a Phase 2 (years 2027-2035) allocation for 20.5 hectares of employment land.

#### B13/17 South Harbour Part Two (New Bid)

486: The sites comprise various zonings including business and industrial areas, green belt and green space network, and existing Opportunity Sites OP64: Former Ness Tip Solar Farm, and OP54: Altens East Materials Recycling Facility. The coast and cliffs are distinctive

and defining features of Aberdeen and much of the general area is identified as part of the city's green belt.

Energy transition refers to the global energy sector's shift from fossil-based systems of energy production and consumption including, oil, natural gas and coal – to renewable energy sources like wind, tidal and solar. Aberdeen is ideally placed, geographically, to capitalise on energy transition opportunities which will help to safeguard the City region's economic future. It also has the skills and workforce to diversify within the energy sector. The construction of Aberdeen South Harbour creates the opportunity to help accommodate energy transition-related uses. An Energy Transition Zone is therefore identified at St Fitticks Park OP56 (Site E and part of B) and Doonies OP61 (site C) and a new Policy B5 will allow for the development, production, assembly, storage and/or distribution of infrastructure required to support low-carbon and renewable energy related industries; this includes offshore wind, tidal, hydrogen and solar.

#### B13/18 South Harbour Part Three (New Bid)

486: The sites comprise various zonings in the extant ALDP, including business and industrial areas and land for transport. In areas currently identified as a business and industrial area relevant uses would be suitably located under current zoning and policy. Land for transport safeguards land for specific transportation projects.

#### B13/19 South Harbour Part Four (New Bid)

486: The sites are all designated green belt, and green space network, and fall within the undeveloped coast policy. The Balnagask to Cove Local Nature Conservation Site is present within the site. Designated species and locally important species are noted on site. The coast and cliffs are distinctive and defining features of Aberdeen. To develop along these areas will be significantly detrimental to Aberdeen's landscape. Development would remove a section of Balnagask Golf Course and have implications to the formal and informal path network running along and to and from the coast.

#### **Planning authority action/recommendation for Proposed Plan**

An Energy Transition Zone is identified at St Fitticks Park OP56 (Site E and part of B) and Doonies OP61 (site C) and a new Policy B5 will allow for the development, production, assembly, storage and/or distribution of infrastructure required to support low-carbon and renewable energy related industries; this includes offshore wind, tidal, hydrogen and solar.

<b>Issue 8</b>	<b>City Centre and the Network of Centres</b>
<b>Section of the MIR to which the issue relates:</b>	Main Issue 8 Aberdeen City Centre and the Network of Centres
<b>Planning authority's summary of the comment(s):</b>	
<b>Main Issue 8 Aberdeen City Centre and the Network of Centres</b>	
<u>Q5: City Centre Boundary</u>	
<u>Do you agree the Local Development Plan should modify its city centre boundary to match the city centre boundary shown in the City Centre Masterplan?</u>	
<p>1, 3, 18, 99, 138, 318, 361, 367, 422, 445, 451, 456, 472, 478, 481, 544, 549, 552, 563, 574, 596, 599: Agree that the Local Development Plan should modify its city centre boundary to match the city centre boundary shown in the City Centre Masterplan.</p> <p>366: Modify boundaries if it will lead to less administrative burden and more efficient and cohesive planning/development decisions.</p> <p>481: Agree the boundaries should match, but suggest that consideration be given to the designation of the larger area to encourage more opportunity.</p> <p>549: To ensure a coherent and joined-up development policy is applied.</p> <p>554, 560: City centre should include all locations in pink and black lines.</p> <p>574: Broadly agree. Boundary for CCMP could be modified to incorporate the section of the LDP boundary that includes a section of King Street.</p> <p>291, 469: Do not agree that the Local Development Plan should modify its city centre boundary to match the city centre boundary shown in the City Centre Masterplan.</p> <p>469: The benefits have not been made clear.</p> <p>99: Need to be cognisant of any implications for parking controls if controlled parking zones or parking standards are linked to city centre boundary.</p> <p>366: Notes the question isn't suitable for a lay person who doesn't recognise what issues might arise from not aligning the boundaries.</p> <p>451: There should be a clear definition of "City Centre". If this defines the core retail and administrative centre of the town, then both outlines would appear to extend beyond this definition.</p>	

544: Aspects set out in vision and development summaries accord with WHO healthy cities principles. Respondent commends use of the Place Standard in the pre-MIR consultation.

480: Do not object in principle. Sufficient safeguards should be put in place in order to protect and prioritise the City Centre Retail Core as the most sequentially preferable location for town centre related uses. Sites currently outwith the boundary of the city centre which would subsequently be included within its boundaries as a result of the modification (e.g. North Dee, Torry Waterfront and Castlegate /Castlehill) should be appropriately controlled in terms of use, scale and density to ensure the continued primacy of the City Centre Retail Core and to prevent dilution of its status by permitting significant retail/leisure destinations in outlying areas of the city centre boundary.

619: Concern raised over proposal to reduce scope/boundary of 'City Centre' and unintended potential consequence of reduced investment, support, focus and promotion of which a large number of local business in the area feel they are in need of or could benefit from. Concern raised without the below options there will be reduced footfall, revenue, business activity and declining quality of experience in and around these areas for those in the community.

Recommends 2 options:

1. King Street & Justice Lane/Harbour areas remain within the LDP classification of 'city centre'.
2. King Street & Justice Lane/harbour areas receive specific, geographically focussed support in a similar way as the initiatives (Aberdeen Inspired, Greater George Street Traders Association, Traders and Market Stalls, Belmont Street fair etc)

#### Q6: City Centre Masterplan Intervention Areas

Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites with the Local Development Plan?

1, 18, 99, 318, 361, 366, 367, 368, 385, 445, 456, 469, 471, 472, 478, 480, 481, 544, 549, 554, 563, 574, 596: Agree that the City Centre Masterplan intervention areas should be identified as opportunity sites with the Local Development Plan.

471: Agree provided there is no overdevelopment.

560: Some should be identified but keep historic features.

284: There should be no opportunity sites. No more development.

294: Intervention areas should not be Opportunity Sites.

565, 583, 595: No, not unless they have specific, deliverable and effective development solutions. As brownfield sites they should be treated as windfall and considered as an additional layer of housing flexibility.

599: No view. Ability to deliver will be affected by land ownership rather than whether it is an opportunity site.

385: Pre-Application consultation with authority and agencies encouraged as sites progress.

469: Caution must be taken. There is currently a high level of un-occupied office space in Aberdeen and a decline of high street retail. Redevelopment shouldn't be based on an outdated model of shops, offices and eateries. Priority should be given to 1. Vacant and derelict land; 2. Renovating and repurposing existing buildings and 3. New builds.

471: Ensure developments allow for a mix of age groups by providing a range of accommodation types. All of the potential developments should be mixed use (residential – houses and flats) and commercial (retail, offices, leisure and hotels).

472: Provided there is long and meaningful consultation with residents of Aberdeen and expectation that nothing would go ahead unless agreed by majority. Heritage of the City should be put above anything.

478: It will add greater weight to proposals in the City Centre Masterplan and enhance the city.

480: Proposals which would contribute to delivering the aims and objectives of the City Centre Masterplan should continue to be supported. Uses and forms of development within such areas should continue to be defined in the LDP.

486: Could be a sensible approach, however the direct substitution of the masterplan areas into the LDP 2022 is not encouraged without full and detailed dialogue with key landowners/stakeholders and without a more refined masterplanning process to test the project deliverables within the city centre masterplan. Land at Torry Waterfront (South Dee) in particular.

549: These OPs should be governed by masterplans to ensure coherent and sustainable development.

99: Station Gateway – should make reference to bus station as key gateway to the city which is currently not adequate in terms of capacity or facilities.

99: North Dee – Multi-storey car park would need to be considered against car parking standards and ensure it fits within the Strategic Car Parking Review and the aim to reduce car parking in the City.

451: Concerned about redevelopment of the indoor market. This will result in loss of a small but important element of local retail and will destroy the small scale local traders. If the business rates issue can be resolved these local traders could move to vacant units in city centre. Small niche shops are historically the starting point for regeneration.

478: Of particular importance from an arts and cultural venue perspective are the Queens Square and Union Street West intervention areas.

480: Bon Accord Centre (CM07), St Nicholas Centre (CM09) and reinstating the central role and enhancing the attractiveness and connectivity of Union Street as well as improvements to St Nicholas Street/Market Street are essential for the future of Aberdeen city centre as a destination and should remain as some of the key priorities for the city centre.

512: Supports Queen's Square intervention area and vision to transform into a mixed use urban quarter. It is requested that the eastern annex is expanded to include additional space owned by the University of Aberdeen which is currently underused. Its inclusion would bring the area into meaningful use and ensure the space is not severed from the rest of the building. Shoe Lane Cottage to the east should also be included and extent of land holding is identified on plan enclosed with representation.

543: Notes artist impressions show some landscaping and would like direct mention of this in the Vision and Development Summary. In particular highlighting urban planting as part of the development plans for the intervention areas. If sites are to be included in the LDP then landscaping element is an important consideration and should be listed as part of the site specific requirements in the LDP. Respondent notes that urban canopy cover across the city is less than other cities and towns in Scotland at 10%. Opportunities, such as these intervention sites, should be taken to help support an increase in tree canopy cover across the city.

544: Impact of these sites on health care will be evaluated as/when applications come forward.

552: Six of the intervention areas mention use class 7, Hotels and Hostels but are not specific about size or quality grading. Aberdeen no longer has a undersupply of bed stock with approx. 3000 rooms open. Stricter planning guidelines should be implemented to avoid potential negative impact on hospitality sector. Benchmarking data provided indicates a lowering of expectations from customers if the available accommodation is low star. The LDP must be cognisant of this and specify the quality grading required to meet the Regions investment strategy.

596: Keen to meet with officers to discuss aspirations for Trinity Centre and wider Station Gateway Intervention Area.

599: Generally supportive of CCMP intent to deliver significant improvements to the city centre.

599: Removal of Denburn car park without replacement will make it harder for people to reach new retail and employment space created on the site and the city centre. This would have detrimental impacts.

599: Inclusion of timescales and deliverability of sites (ownership issues mentioned) could be added to proposals.

599: Further details needed regarding access to the centre if significant stretches on and around Union Street are to be pedestrianised to improve public realm. Robust plan needed to transition private car users towards public transport.

599: North Dee district looks attractive however queries are raised regarding demand for office space. There will be transport and public transport implication with this site given the high level of workers to be accommodated here.



599: Further detail is required to deliver the CCMP. Overall delivery scheme has to address the intended built environment and the cultural and mode of transport shifts.

633: Where a site (or part of) has known flood risk, must be accompanied by a satisfactory Flood Risk Assessment – the outcome will advise the appropriate level of development.

633: North Dee, Torry Waterfront and city centre living sites should be accompanied by a Flood Risk Assessment if they are found to be located on a floodplain.

627: Serious concerns raised about proposed intervention area at “Queens Square”. Loss of purpose built Council buildings not supported and relocation to King’s College is not appropriate given the distance from the city centre. The use of Mitchell Hall is not appropriate for a debating chamber and concern is raised about alterations required on a listed building.

#### Q7: City Centre Retail Core

Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?

1, 3, 18, 20, 22, 284, 291, 318, 361, 366, 367, 368, 390, 445, 449, 451, 456, 476, 478, 480, 544, 549, 554, 560, 563, 596, 599: Agree that the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres.

368: Concentration of shops in smaller area makes sense when considering increased tourists from harbour expansion will have limited time in the city per visit.

445: The damage has been done with the encouragement of stores on the city perimeter for easy access for cars – will be difficult to reverse.

451: Castlegate should be included.

456: Agree in order to establish redevelopment more quickly and be able to gauge effectiveness of redevelopments undertaken before moving on to other sections.

469: Poor travel restricts access to Union Street. Keep retail areas small and distinct rather than the homogenous nature of every other UK town centre. Breed diversity in shopping experience as long as public transport, access, bike access and parking are improved.

471: Retail core should probably be reduced.

472: Possibly and help to reuse empty buildings.

476: Support a modest reduction to focus on a compact area of Union Street (Bridge Street to Broad Street) and the existing shopping centres at either side of the north-south axis. Vision to cement city centre as a major regional centre is fully supported. While Union Street is an important unifying feature in the city there has been a distinct shift in how it performs and how it is perceived. With reference to CCMP, retail should not always be the primary or most appropriate town centre use. Concentrating retail provision will assist with efforts to increase the breadth and depth of the retail offer. Recognition of the mixed use areas

surrounding the retail core and qualitative offer of the west-end (shops, cafes, boutiques) is welcomed as it helps to ensure variety and interest.

478: Greater flexibility for wider mix of uses may benefit vitality and viability of the wider City Centre while helping to minimise vacancies and help minimise vacancies and prolonged period of vacancy.

480: Support of proposals to reinstate Union Street and establish stronger linkages north and south between the existing shopping centres at Bon Accord and Union Square.

481: The identification of a hierarchy could be a beneficial approach. Development proposals should be considered, however, on their own merits.

542: Respondent queries what plans are to deal with what used to be core e.g west end of Union Street if the core is to be reduced.

544: To ensure policies and plans are aligned.

549: The present retail core is unsustainably big.

554: No more expansion at Union Square – focus on getting footfall back to Union Street and revamp indoor market.

574: Current limits defined by shopping centres and Broad Street to Huntly Street still appear appropriate. Should not prevent conversion of vacant properties from retail to residential use if there is a demand for this.

596: Yet it should not prohibit the potential development of sites where it can be demonstrated that the loss of existing retail provision would: not undermine the main function of the retail core, give rise to transformational regeneration benefits, promote wider objectives of CCMP.

599: Given trends of retail shrinkage across Britain. This does raise the question of whether pedestrianisation of Union Street is a realistic objective anymore.

619: Opportunities for retail should be made at every possible opportunity, open to a broad variety of retail outlets rather than just limited to existing premises or shopping centres. If retail space is limited to only refurbished/developed sites there may be increase in rates and vacancy rates where this becomes unaffordable. Suggests promoting market space for retail to support stall holders citing example from New York. It is important for those in vulnerable circumstances to be able to access locally based affordable goods. Encouraging local businesses to success should take priority over enforcing limitations.

#### Q8: Union Street Frontages

Should the Union Street Frontages Percentages be reviewed? Do the current target percentages ensure there is a balance between ensuring a strong retail focus and allowing for other uses?

What other uses should we allow on the retail core area of Union Street?

20: Union Street needs small attractive local shops, cafes and eateries and housing.

22: Yes the Union Street Frontages Percentages should be reviewed.

22: People no longer wish to walk/shop in the open.

22: Restaurants should be allowed.

110: Union Street has many unoccupied premises. Independent retailers should be encouraged.

284: More bars and restaurants if free parking is provided.

361: Sector A appears low. There could be more bars, restaurants and cafes.

366: Agrees with percentages in principle – its more the type of retail provided – should be focussed on independent shops and quality national retailers to bring residents and tourists into the centre. Type of retail currently offered is not appealing (vape shops, betting, discount stores etc).

367: Mix of uses for Union Street – seating and open space for people to linger.

368: Frontages percentages should probably not be reviewed.

368: A degree of flexibility should be exercised to ensure units aren't left vacant. Mix of uses welcomed. Book makers and vape shops should be relocated to allow more local, independent shops to move in.

368: Consider providing workshop/gallery space to artists and craftworkers.

445: Maintenance and presentation of all frontages on Union Street needs to be addressed and then progressively increase the quality of shop/store being allowed on Union Street.

451: Discussion needed between property owners and the relevant community and historic groups.

456: Given the significant impact of internet trading on traditional retail, the percentages should be subject to ongoing review to ensure flexibility as habits and culture continue to change.

459: Frontage percentages are fine.

471: Important to maintain retail frontages in the High Streets to support individual walkable neighbourhoods. Sticking rigidly to figures may not be the best way to ensure retail use continues.

471: An overprovision of night time offerings (pubs and clubs) makes the area unattractive and should be avoided. Union Street does not offer a pleasant experience on Friday and

Saturday night to due over provision of night activities and is a threatening place to be. Locate some of this activity in other areas.

472: Probably as its better seeing units in use than standing empty.

478: Support the approach. Greater diversification of town centre uses, including increased flexibility for cultural and leisure uses should help strengthen the ongoing role and attractiveness of Aberdeens city centre.

481: Whilst percentage frontages play a role in monitoring activity, SPP encourages a mix of uses including class 1, 2 and 3 in centres. The nature of retailing is changing such that proposals should be considered on their own merits.

544: Broadly supportive of spirit of trying to retain a high retail presence. Respondent would like to see health care as a potential alternative use particularly as encouraging city living is also included within the MIR. Respondent notes having support towards health care use would be welcomed if there was future need for city centre facilities.

554: Yes and encourage high quality destination/leisure activities.

560: Yes and destination type places such as galleries and cafes.

562: Agree with current percentages.

562: Other uses could include European style cafes with outdoor/sheltered seating and increased parking for cycles.

563: Yes – Union Street needs to be transformed into an attractive place to visit and attract people to the city centre.

574: Some of the % levels could be reduced to encourage occupation. Preference for occupied buildings as long as there is control over the types of use e.g limit gambling premises and fast food premises. Encourage inclusion of local business hubs and innovation centres which are open to wider community. There could also be more residential and leisure sites.

596: The emerging LDP should be flexible enough to allow the market to respond to changing retail habits in order to create the right environment to attract people to visit and stay longer. This includes allowing for a wider mix of uses in the City Centre core which reinforce traditional retail units. Support action which places emphasis on retailing in the city centre core but also provides a framework for consideration of other vibrant, non-retail uses. Current LDP Policy NC2 sets out strict criteria for change of use and this has potential to stifle changes of use likely to be benefit to the city centre e.g class 1 to class 3. Retail forms only one part of the experience for visitors to a city/town centre. Respondent urges the emerging LDP to incorporate more flexible policies in connection with changes of use in the retail core. Percentage targets are too arbitrary, stifle creativity and innovation and are likely to result in significant voids in the likely event that demand for retail space continues to decline.

599: Core issue is viability of a large retail area. If there is demand, retail premises will be taken up. If demand falls premises will lie empty unless a change of use is allowed. Suggest other uses should be encouraged in such cases to ensure occupancy. Appropriate uses would be business hubs, leisure or residential but limit on gambling and fast food premises.

Q9: Out of Town Retailing

A. Should we direct high footfall uses to existing centres including the city centre?

B. Should we consider new out of town retail parks?

C. What would the impact of these be on Union Street and the city centre, and Aberdeen's network of centres?

Favours Option A

3, 96, 99, 271, 361, 368, 451, 456, 472, 476, 477, 478, 480, 481, 483, 549, 551, 554, 562, 563, 574, 596, 599, 633: Agree that high footfall uses should be directed to existing centres including the city centre.

99: City Centre should be the focus – accessible by all and by active and public transport.

284: Keep retail in the city centre.

456: Continue with current approach until the future of retail is more clear.

471: Trying to direct commercial activity to the centre is not the right policy.

476: Principles are set out in national and regional policy documents (incl Proposed Aberdeen City and Shire SDPA). As such, the City Centre Retail Core should be supported as the preferred location for all retail, commercial, leisure and other significant footfall generating development serving a city-wide or regional market.

476: Town centre first approach is the best way to preserve vitality in the City Centre. Given retail trends it is more important than ever that new out of town retail proposals are resisted.

478: To strengthen role and attractiveness of Aberdeens city centre.

480: Given changes in retail and ongoing impact of digital shopping platforms it is even more essential to maintain focus retail spend within the city centre.

480: It is essential that investor confidence is maintained. Whilst it might be easier for a developer to deliver development on a greenfield site (an out of town retail park for example); the more challenging development proposals (such as those within the city centre) require a greater level of confidence in the certainty of development plan policy in order to achieve them. Town centres can often require considerable investment to upgrade existing spaces and public realm – sites can often have multiple ownership, heritage constraints, servicing and access challenges – and can impact on viability, overly complicate and derail development aspirations even with local planning authority support. Such issues make prioritisation of town centre first development even more important.

480: Strongly advocate the city centre remain the focus for accommodating any identified capacity for additional comparison retail floorspace within the city region and that the council continues to resist pressure to allocate additional sites outwith the city centre.

481: In line with SPP the prevailing policy should continue to require the assessment of sites in a sequential manner.

483: Aberdeen city centre, as the principal strategic shopping destination within the region, should be afforded priority for the location of major new retail development with the rest of the network offering more localised services and shops to cater for the needs of nearby communities.

551: To minimise impact on countryside and need for new infrastructure.

554: Notes Kittybrewster retail park isn't working.

560: Focus on existing empty units in existing centres and retail parks.

563: There needs to be enough free car parking to support the town centre first model.

574: Yes but also requirement for good public transport links to the city and city centre parking for rural area residents.

599: Retail and other facilities must remain concentrated in existing centres.

633: To limit environmental impacts.

Favours Options B and C

Yes and why

3. Agree that new out of town retail parks should be considered, however limited.

22: City Centre and out of town retail parks should be considered. Existing non-niche city centre retailers are struggling and are unlikely to survive. Environmental conditions/weather deter people from shopping outdoors.

383: Out of town retail can be appropriate – particularly for large residential development e.g convenience retail at Loirston where there is a deficiency in the south of the City.

Does not favour Options B and C

18, 37, 96, 138, 271, 284, 318, 361, 362, 366, 367, 368, 390, 445, 449, 451, 456, 469, 472, 473, 476, 479, 544, 549, 552, 562, 574, 596: Not supportive of new out of town retailing.

318, 449, 456, 472, 473, 596: There are sufficient retail parks already/no established need/query over long term viability.

18, 20, 37, 96, 271, 361, 362, 366, 390, 449, 451, 473, 476, 480, 544, 549, 552, 562, 574, 596, 599: Negative direct and indirect impact (vitality, viability, undermine planned investment/strategies, reduced footfall) on city centre and established network of

centres/sequential approach. Would not support vibrancy of existing centres. Counterproductive to town centre first principle. Focus should be on city centre and existing centres. Potential for increased vacancy rates in existing centres.

138: Except where required to ensure sustainable communities.

479: Except where required to support local services.

99, 361, 368, 544: Environmental impact – encourages car trips, reduces ‘walkability’ of cities.

96, 476: Should not be located in greenbelt or along AWPR and its junctions.

560: If they are far enough away there might not be too much impact.

#### Town Centre First/Sequential Approach/Hierarchy of Centres

96, 362, 385, 476, 477, 480, 481, 483, 563: Supportive of continuation of extant approach/town centre first/sequential approach/hierarchy of centres in line with national policy.

96: Supports current and continued zoning of Beach Boulevard Retail Park as a commercial centre.

362: Supports current and continued zoning of Garthdee Retail Park as a commercial centre.

96, 362: Supports approach to widen the range of uses within the Commercial Centres.

476: Maintain undesirable status of Pre-MIR bids Prime West Kingswells; Maidencraig North West; Smiddybrae Kingswells; Contlaw Milltimber; Wellington Road East; Rowett North; Mundurno; Newton of Mundurno; the former Aberdeen Exhibition and Conference Centre; and, Perwinnes.

138: Dispersing retail centres too much only encourages car use.

451: Neighbourhood centre of Old Aberdeen is not included. Locality around High Street and King Street roundabout should be identified as neighbourhood centre.

471: Chapel Street/Thistle Street area should be retained as a premium mixed use area that supports retail uses. Rosemount is similarly a great example of a High Street located as part of a mixed use neighbourhood – this should be encouraged and other areas supported to provide a similar offering.

471: With reference to pollution in city centres, the approach should not be to ban traffic in the centre but instead adjusting uses to stop the pollution from happening at the outset. The sequential approach to commercial development is wrong. If the centre is full, put other commercial uses (including retail) into the centre of mixed use areas (for example at Grandhome or introduce a High Street into Bridge of Don, Cove or Milltimber). Trying to direct commercial activity to the centre is not the right policy.

477: Unbuilt neighbourhood and district centres “to be” which have been masterplanned should be recognised and identified as retail centres. A flexible approach to development types should be sought to allow Grandhome to become mixed-use and support sustainable communities.

480: Proposals which could negatively impact upon vitality and viability of the city centre should continue to be resisted.

483: Pro-active approach to allocating future floorspace needs linked to areas of major population growth is welcomed. It is considered essential that emerging policies in respect of new convenience provision within the LDP still allow for additional opportunities to come forward in the shorter term, in areas where a qualitative or quantitative need can be demonstrated and where other policy requirements in terms of improving accessibility, minimising impact and adherence to sequential test can still be achieved. There are pockets within the city where range and choice is more limited and could be improved through qualitative enhancements to provision.

596: Object to proposal to modify role of Commercial Centres so they support and promote wider range of uses within them as this is not considered absolutely essential. Currently the LDP restricts the function of commercial centres to sale of bulky goods as permitted by SPP paragraph 63. If certain parks are modified, full justification must be provided and officers should be confident that there will be no adverse/harmful impact on existing and established centres within Aberdeen. Paragraph 71 of SPP also pertinent. Policies for commercial centres should state that new floorspace in these locations and/or relaxation of restriction of goods sold will only be permitted where they demonstrate compliance with the impact and sequential approach.

619: Fully supports encouraging greater numbers of people to visit and live in the city centre and city as whole with policy framework in place.

#### Q10: Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?

3, 18, 20, 22, 37, 96, 138, 271, 284, 291, 318, 361, 366, 367, 368, 422, 445, 449, 456, 472, 478, 479, 480, 544, 549, 554, 560, 562, 563, 574, 599: Agree that commercial leisure uses continue to be directed towards existing centres and the beach and leisure area.

96: Other than at the existing retail centres currently allocated, further retail development at the Beach Area should be discouraged.

138: However, this should not preclude development of small-scale leisure facilities in sustainable peripheral communities who require them.

318: Existing centres should be upgraded and refreshed and new proposals considered such as B0945 Shepherds Retreat for tourist accommodation and leisure/recreation.

368: Should be separate from residential areas.



422: Beach should remain an attractive environment and the provisions within NC9: Beach and Leisure (extant Local Development Plan) adhered to.

456: Upgrades required.

469: There is already a mixture of leisure areas in Aberdeen. If the opportunity arises for leisure outwith these areas it should be considered on a case by case basis and protect green open spaces.

471: With reference to the night time economy (specifically Union Street) commercial leisure uses should be located in other areas.

472: Yes as there are empty units.

473: Opportunity to turn warehouses into leisure uses should be welcomed.

476: Town centre first approach should be followed in line with national and regional policy. It is acknowledged that leisure uses have historically developed within the city centre and at the beach and there is acceptance that the beach provides alternative space for commercial leisure activities and these uses may be mutually beneficial to attract users to the city. However, proposals for commercial leisure uses are required to follow the network of centres and sequential approach. While there is support for leisure uses within the Beach and Leisure zoning, this must be subject to assessment against the sequential approach. As such Policy NC9 (current plan) should be updated to require that any new such development proposals in this location are demonstrated by the applicant to not be capable of being readily accommodated within the City Centre. It is important that the presumption against retail development in this area should be upheld in new Policy NC9. With the above in place, new attraction will remain commensurate with the beach areas appropriate function as a leisure and recreation destination which complements and supplements the city centre and safeguards the latter as the principle regional destination for high footfall uses.

480: Commercial leisure uses can generate significant levels of footfall. These types of developments should follow the sequential approach and be directed to existing centres.

544: This allows for collaboration between health and leisure services within these centres.

562: Support. To preserve and increase the vibrancy of the existing areas.

574: Cinemas and other visual attraction should be in the centre to increase footfall for restaurants. Sports/gyms etc should be spread across the city – notes health benefits. New large scale housing developments – e.g Countesswells should incorporate a local leisure centre.

599: Sport/leisure are probably better distributed throughout the suburbs as well as in existing centres as they are used daily.

### General City Centre/Retail Comments

3. The high street is under considerable pressure due to internet shopping and retail parks. Consider reducing rates in city centre to make it more attractive.

18: Should be more sympathetic to the historic Union Street shop frontages and support their restoration.

20: Attractive spaces are needed.

37: Sort out Union Street.

110: Union Street is the main street and should reflect more character.

138: Union Street needs to be revitalised. Variety and quality of shops has become very poor due to high business rates. Partial pedestrianisation and lower rates would help.

138: Shopping centres should be within reasonable walking distance of each other.

138: Unless public transport to outlying areas is improved, sufficient car parking will be needed in the city centre.

284: Lower rent for non-chain businesses/start-ups.

291: Stop building shopping centres and reinvigorate Union Street.

291: Stop authorising new developments and focus on Union Street.

318: Boulevard-type street access supported, develop underutilised lanes and prioritise The Green and Old Market.

366: Current vacant units and condition of Union Street is described.

366: City centre should be improved if we are to attract tourists via the harbour expansion project.

366: Focus on ensuring that building owners/retailers adhere to strictly enforced standard of upkeep of buildings.

366: Pedestrianisation of some city centre streets should be an option with a mix of uses (quality retail, business and housing).

390: Tidy up Union Street Frontages

449: Union Street is in desperate need of an upgrade. Glasgow is a perfect example of how a city centre can be transformed into a vibrant attractive city for both residents and tourists.

449: Union Street is embarrassing for such a wealthy city. It should be pedestrianised and have outside areas for cafes. Rent should be lowered to allow for a more diverse range of shops.

457: Requirements of youth should be considered. They need something that engages them and not more shops.

469: Union Street frontages need work. Effort should be made to clean windows and gutters and improve the visual impression of the city.

473: Union Street continues to decline – development or investment in Union Street should be encouraged.

480: The emerging LDP should prioritise working with relevant stakeholders and owners of city centre development opportunity sites to explore partnerships and funding mechanisms (such as a Growth Accelerator Model) which could help to bring forward development proposals and assist in the delivery of LDP objectives to improve quality and diversity and enhance the vitality and retail attractiveness of the city centre.

480: Whilst retail provision in city centre is strong, the offer is fragmented and lacks quality in some areas (particularly on Union Street). Shopper experience could be improved.

562: Union Street is the heart of the city and agree that investment is required to Union Street and the surrounding area to attract high quality retail and visitors. A pedestrian zone would be good to increase different activities within the Retail Core.

619: As a priority the maintenance and upkeep of paving and buildings along and adjacent to Union Street and King Street including frontages and upper floors. Encouraging the use of floors beyond ground level is promoted with housing, office space and more.

619: Maintain/restore historic cobbles

619: Further support for local businesses (cafes, restaurants, artisans, crafts and more). Support the development of an environment which enables these opportunities to thrive to ensure economic success. It is the local and unique places which give a unique sense of place, character and communities for visitors and those living in the city.

#### **Summary of response by planning authority:**

#### **Main Issue 8 Aberdeen City Centre and the Network of Centres**

##### Q5: City Centre Boundary

Do you agree the Local Development Plan should modify its city centre boundary to match the city centre boundary shown in the City Centre Masterplan?

1, 3, 18, 99, 138, 291, 318, 361, 366, 367, 422, 445, 451, 456, 469, 472, 478, 480, 481, 544, 549, 552, 554, 560, 563, 574, 596, 599, 619: Comments for and against amending the boundary are noted. Further consideration needs to be given on the exact city centre

boundary based on the results of the Main Issues Report consultation and following review of the updated Retail Study.

99: Designation of parking zones and associated standards follow a separate and distinct process. All areas of the city centre boundary are currently covered by the city centre or inner city parking zone and associated standard. Project IN02 of the City Centre Masterplan (CCMP) proposes for “stricter parking standards within the city centre boundary to enforce ‘zero parking’ for new development. Existing policies already promote low or no car development in the city centre thus this would not represent a shift change in policy direction.

451, 480: The city centre retail core is a distinct zoning from the city centre boundary. These currently have different boundaries and will continue to do so in the next ALDP as they serve different purposes. Whilst both the city centre and retail core are the preferred locations for all retail, office, hotel, commercial leisure, community, cultural and other significant footfall generating developments the retail core identifies the area where the highest concentration of shopping floorspace is located within the city centre and where new retail development should be directed. Further consideration needs to be given on the exact city centre boundary, retail core boundary and acceptable uses based on the results of the Main Issues Report consultation and following review of the updated Retail Study.

480: In line with Scottish Planning Policy, the town centre first principle, hierarchy of centres and sequential approach, proposals for significant footfall generating developments will be assessed in accordance with the hierarchy.

619: Concerns over potential unintended consequences of boundary amendments are noted. Whilst further consideration of exact boundaries is required, where an area may be removed from the city centre boundary we would seek to replace with an appropriate zoning. Locations in close proximity to the city centre boundary would likely be considered as edge of city centre in line with the hierarchy of centres and proposals would be assessed according to the sequential approach outlined in relevant Aberdeen Planning Guidance.

#### Q6: City Centre Masterplan Intervention Areas

Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites with the Local Development Plan?

1, 18, 99, 284, 294, 318, 361, 366, 367, 368, 385, 445, 456, 469, 471, 472, 478, 480, 481, 486, 544, 549, 554, 560, 563, 565, 574, 583, 595, 596, 599: Comments about the identification of the City Centre Masterplan intervention areas as opportunity sites are noted.

284: The Strategic Development Plan states that the ALDP should set out the projects set out in the City Centre Masterplan. The ALDP is written in accordance with the Strategic Development Plan.

599: Allocation of the intervention of the opportunity areas will establish the principle of development within the boundary.

385, 469, 471, 472, 486, 549, 565, 583, 595, Concerns raised about deliverability, overdevelopment, impact on historic features, consultation with residents, scale, type and mix of development will be assessed through masterplanning (where required) and planning application process. Pre-application discussions and discussion with stakeholders is welcomed. Allocation of the intervention areas will allow the scrutiny of the proposal through the ALDP examination process. Deliverables and timescales will be set out in masterplans and the action programme.

99: Station Gateway – should make reference to bus station as key gateway to the city which is currently not adequate in terms of capacity or facilities.

99: North Dee – Multi-storey car park would need to be considered against car parking standards and ensure it fits within the Strategic Car Parking Review and the aim to reduce car parking in the City.

451: Concerned about redevelopment of the indoor market. This will result in loss of a small but important element of local retail and will destroy the small scale local traders. If the business rates issue can be resolved these local traders could move to vacant units in city centre. Small niche shops are historically the starting point for regeneration.

478: Of particular importance from an arts and cultural venue perspective are the Queens Square and Union Street West intervention areas.

480: Bon Accord Centre (CM07), St Nicholas Centre (CM09) and reinstating the central role and enhancing the attractiveness and connectivity of Union Street as well as improvements to St Nicholas Street/Market Street are essential for the future of Aberdeen city centre as a destination and should remain as some of the key priorities for the city centre.

512: Supports Queen's Square intervention area and vision to transform into a mixed use urban quarter. It is requested that the eastern annex is expanded to include additional space owned by the University of Aberdeen which is currently underused. Its inclusion would bring the area into meaningful use and ensure the space is not severed from the rest of the building. Shoe Lane Cottage to the east should also be included and extent of land holding is identified on plan enclosed with representation.

543: Notes artist impressions show some landscaping and would like direct mention of this in the Vision and Development Summary. In particular highlighting urban planting as part of the development plans for the intervention areas. If sites are to be included in the LDP then landscaping element is an important consideration and should be listed as part of the site specific requirements in the LDP. Respondent notes that urban canopy cover across the city is less than other cities and towns in Scotland at 10%. Opportunities, such as these intervention sites, should be taken to help support an increase in tree canopy cover across the city.

544: Impact of these sites on health care will be evaluated as/when applications come forward.

552: Six of the intervention areas mention use class 7, Hotels and Hostels but are not specific about size or quality grading. Aberdeen no longer has a undersupply of bed stock with approx. 3000 rooms open. Stricter planning guidelines should be implemented to avoid potential negative impact on hospitality sector. Benchmarking data provided indicates a lowering of expectations from customers if the available accommodation is low star. The LDP must be cognisant of this and specify the quality grading required to meet the Regions investment strategy.

596: Keen to meet with officers to discuss aspirations for Trinity Centre and wider Station Gateway Intervention Area.

599: Generally supportive of CCMP intent to deliver significant improvements to the city centre.

599: Removal of Denburn car park without replacement will make it harder for people to reach new retail and employment space created on the site and the city centre. This would have detrimental impacts.

599: Inclusion of timescales and deliverability of sites (ownership issues mentioned) could be added to proposals.

599: Further details needed regarding access to the centre if significant stretches on and around Union Street are to be pedestrianised to improve public realm. Robust plan needed to transition private car users towards public transport.

599: North Dee district looks attractive however queries are raised regarding demand for office space. There will be transport and public transport implication with this site given the high level of workers to be accommodated here.

599: Further detail is required to deliver the CCMP. Overall delivery scheme has to address the intended built environment and the cultural and mode of transport shifts.

633: Where a site (or part of) has known flood risk, must be accompanied by a satisfactory Flood Risk Assessment – the outcome will advise the appropriate level of development.

633: North Dee, Torry Waterfront and city centre living sites should be accompanied by a Flood Risk Assessment if they are found to be located on a floodplain.

627: Serious concerns raised about proposed intervention area at “Queens Square”. Loss of purpose built Council buildings not supported and relocation to King’s College is not appropriate given the distance from the city centre. The use of Mitchell Hall is not appropriate for a debating chamber and concern is raised about alterations required on a listed building.

99, 451, 478, 480, 512, 543, 552, 596, 599, 627, 633: Comments on the specific intervention areas are noted.

99: A development brief for Station Gateway has been prepared and approved as local planning advice (which will become Aberdeen Planning Guidance).

512, 544, 596, 599, 633: Engagement with stakeholders is welcomed and will assist in determining issues related to site specific requirements, detailed allocation wording, exact boundaries, flood risk assessment, impact on health facilities, timescales and deliverables in line with the ALDP policies. Masterplanning and the planning application process will also assess these areas.

543: Site specific details such as landscaping and design will be determined through masterplanning and planning application processes. The level of detail is not suitable for inclusion within the ALDP.

552: Regarding specific quality grading of hotels within the intervention areas - the level of detail is not suitable for inclusion within the ALDP.

451: A planning application has been submitted for redevelopment of the market. At the time of writing, it remains under consideration by the Planning Authority.

599: It is agreed that easy access to the city centre by sustainable transport modes and careful consideration of the balance and location of car parking is crucial to minimising traffic. At its City Growth and Resources Committee on 6 June 2019, Aberdeen City Council approved the implementation of a revised Roads Hierarchy Strategy, the drafting of a Car Parking Strategy and the consultation of the draft Sustainable Urban Mobility Plan (SUMP). All these documents will contribute to meeting the transport aims of the CCMP. The city centre is currently highly accessible by walking, cycling and public transport and the proposed 'zero parking' for new development will help facilitate a more attractive centre that is also safer for pedestrians. It will also help achieve the objectives set out in the CCMP.

#### Q7: City Centre Retail Core

Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?

1, 3, 18, 20, 22, 284, 291, 318, 361, 366, 367, 368, 390, 445, 449, 451, 456, 476, 478, 480, 544, 549, 554, 560, 563, 596, 599: Support for reducing the retail core to focus on a more compact area of Union Street and the existing shopping centres is noted.

368, 445, 451, 456, 469, 471, 472, 476, 478, 480, 481, 542, 544, 549, 574, 596, 599, 619: Comments relating to reducing and refocusing the retail core are noted.

472: The role of the ALDP in encouraging reuse of empty buildings is being considered as part of the ALDP review and in alignment with the CCMP.

476: Support for focussing the city centre as a major regional centre is welcomed. In line with the hierarchy of centres the city centre and retail core remain the focus for all significant footfall generating development.

476, 478, 574, 596: Flexibility of uses within the retail core and the city centre is being considered as part of the ALDP and in alignment with the objectives of the CCMP to support vibrancy, vitality and viability in our existing retail centres.

481: The existing ALDP, in line with Scottish Planning Policy, already sets out our hierarchy of centres and the emerging ALDP will continue to do so. All development proposals will be considered on their own merits, but an assessment will be carried out to ascertain its accordance with the Development Plan as part of this process.

542: Exact boundaries of a reduced retail core will be considered through dialogue with stakeholders and following review of the updated Retail Study. Whilst further consideration of exact boundaries is required, where an area may be removed from the city centre retail core boundary we would seek to replace with an appropriate zoning.

554: Proposals for amendment and expansion of Union Square were approved as part of planning application. Union Street, as part of the city centre retail core and primary tier on the hierarchy of centres, will remain our preferred location for significant footfall generating development. Intervention Area 2 (Project CM06) of the city centre masterplan relates to the Aberdeen Indoor Market the opportunities available for its redevelopment. Furthermore, a planning application has been submitted for redevelopment of the market. At the time of writing, it remains under consideration by the Planning Authority.

599: Removing cars from the city centre (heart of the city) is an objective within the city centre masterplan. For Aberdeen to remain a flourishing city we must ensure it is attractive, innovative and welcoming. Supporting the vitality, vibrancy and viability of the city centre will require the implementation of projects to allow an enhanced destination environment for visitors and residents alike.

619: Union Street remains the focus for retail and significant footfall generating development, however we must also be cognisant of a changing retail market across the UK. There is no intention to restrict retail but to ensure that Aberdeen remains a competitive and flourishing city we may need to adapt our approach to balance the need to focus retail in the city centre with wider objectives of city centre living, vitality, vibrancy and viability. The extant Union Street frontages policy is a protective retail policy to ensure that ground floor premises, within the union street part of the retail core, were predominately retail. It ensured a minimum percentage rather than capping a maximum and thus did not enforce limitations.

#### Q8: Union Street Frontages

Should the Union Street Frontages Percentages be reviewed? Do the current target percentages ensure there is a balance between ensuring a strong retail focus and allowing for other uses?

What other uses should we allow on the retail core area of Union Street?

20, 22, 110, 284, 361, 366, 367, 368, 445, 451, 456, 459, 471, 472, 478, 481, 544, 554, 560, 562, 563, 574, 596, 599: Comments for and against reviewing the Union Street Frontages Policy and alternative use suggestions are noted. The Councils powers to protect and promote certain uses are limited nor can we influence the occupier of individual premises or the type of goods and services they provide – we can however provide the vision and policy



framework to assess proposals in line with the Scottish Planning Policy, the Strategic Development Plan, the ALDP and the CCMP.

445: Union Street frontages assesses the use within the unit rather than how the shop front looks. Maintenance is a separate issue and not within the remit of the ALDP.

471: Amenity forms part of successful placemaking, and consideration has to be given to the impact of development on adjoining uses. A balance is required to ensure a welcoming environment is provided for residents and visitors alike. Proposals for night time uses will be assessed on their own merits through both the planning system and where required licensing board.

478, 481: The city centre is already the preferred location for all retail, office, hotel, commercial leisure, community, cultural and other significant footfall generating developments. Applications for development will be assessed on their own merits and their accordance with the Development Plan.

20, 22, 110, 284, 361, 366, 367, 368, 445, 451, 456, 459, 471, 472, 478, 481, 544, 554, 560, 562, 563, 574, 596, 599: Union Street remains the focus for retail and significant footfall generating development, however we must also be cognisant of a changing retail market across the UK. To ensure that Aberdeen remains a competitive and flourishing city we may need to adapt our approach to balance the need to focus retail in the city centre with wider objectives of city centre living, vitality, vibrancy and viability. The extant Union Street frontages policy is a protective retail policy to ensure that ground floor premises, within the union street part of the retail core, were predominately retail with minimum percentages specified. It ensured a minimum percentage rather than capping a maximum and thus did not enforce limitations.

Further consideration needs to be given on the Union Street Frontages policy and associated guidance based on the results of the Main Issues Report consultation and following review of the updated Retail Study. It is agreed that allowing a broader mix of uses in the city centre retail core recognises the shift in retail habits whilst also encouraging appropriate nonretail uses to support a vibrant city centre. Where minimum street frontage retail percentages may be altered the other policy requirements should remain in place to ensure continued vitality and balance of uses. It will be critical for non retail uses to be active and encourage footfall. Furthermore, it will be likely that proposals which do not encourage an active frontage will be discouraged.

The Proposed ALDP will seek to increase the diversity of uses in the city centre to include uses which generate significant footfall and promote vitality, whilst protecting existing Class 1 retail uses where appropriate. Encouraging a more varied mix of uses with longer opening hours and increased footfall will help to create a livelier city centre; reduce the need to travel; help to reduce expenditure leakage; address challenges from changing trends and customer habits; and competition from online shopping. Encouraging a repopulated city centre; improving public realm, streetscapes, and green spaces; and raising design standards are also key factors in attracting further inward investment. All of which helps to increase footfall, the use and demand for services and facilities, and social interaction. By making it an appealing place to live, to work and to visit and by providing a high quality environment

with good infrastructure, the City will attract new business and investment and provide a unique visitor experience for residents, and visitors to the City.

Q9: Out of Town Retailing

A. Should we direct high footfall uses to existing centres including the city centre?

B. Should we consider new out of town retail parks?

C. What would the impact of these be on Union Street and the city centre, and Aberdeen's network of centres?

Favours Option A

99, 284, 456, 471, 476, 478, 480, 481, 483, 551, 554, 560, 563, 574, 599, 633: Comments are noted.

3, 96, 99, 271, 361, 368, 451, 456, 472, 476, 477, 478, 480, 481, 483, 549, 551, 554, 562, 563, 574, 596, 599, 633: Support for continuing to direct high footfall uses to existing centres including the city centre is welcomed.

99, 284, 456, 471, 476, 478, 480, 481, 483, 551, 554, 560, 599: In line with national and regional policy the Council remains committed to supporting the town centre first approach and will continue to protect established centres and direct all significant footfall generating development to the city centre in line with the sequential approach. The updated retail study has reviewed the existing centres and amendments may be proposed accordingly.

Favours Options B or C

18, 37, 96, 138, 271, 284, 318, 361, 362, 366, 367, 368, 390, 445, 449, 451, 456, 469, 472, 473, 476, 479, 544, 549, 552, 562, 574, 596: Comments relating to not supporting new out of town retail are noted.

3, 18, 20, 22, 37, 96, 99, 138, 271, 284, 318, 361, 362, 366, 367, 368, 390, 445, 449, 451, 456, 469, 472, 473, 476, 479, 480: 544, 549, 552, 560, 562, 574, 596, 599: The Council is committed to supporting the town centre first approach and will continue to protect established centres from out-of-centre retail development. Full analysis of the updated retail study will highlight any qualitative/quantitative deficiencies in retail offer, inform any review of the current network of centres and boundaries in conjunction with reviewing the city centre boundary.

383: The principle of convenience retail at Loirston has already been established through the extant ALDP and development framework.

Town Centre First/Sequential Approach/Hierarchy of Centres

96, 362, 385, 476, 477, 480, 481, 483, 563, 619: Support for following the town centre first principle, network of centres and sequential approach is welcomed.

96, 362: Note support for continued zoning of Garthdee and Links Road/Boulevard as commercial centres and proposed approach to widen range of uses permitted within them.

476: Support for undesirable status is noted.

138, 471: Clustering uses that attract people in centres helps to create sustainable mixed communities. The hierarchy of centres aims to ensure that developments which attract large volumes of people are located within appropriate centres. The updated retail study has reviewed the existing centres and amendments may be proposed accordingly.

451: Neighbourhood centre at King Street roundabout is already identified as “Seaton”. Where a neighbourhood centre has not been identified, local shops, such as those at Old Aberdeen High Street, are protected through the ‘Local Shops’ policy. The hierarchy of centres will continue to be reviewed as part of the Development Plan process. The updated retail study has reviewed the existing centres and amendments may be proposed accordingly.

471: Full analysis of the updated retail study will highlight any required amendments to current hierarchy of centres and Policy Zoning re: West End Shops and Cafes area. Rosemount is already identified as a Town Centre in the extant ALDP.

471: In line with national and regional policy the Council remains committed to supporting the town centre first approach and will continue to protect established centres and direct all significant footfall generating development to the city centre in line with the sequential approach. A hierarchy of centres has been established within the current ALDP where Cove, and Bridge of Don have numerous entries as neighbourhood centres. The sequential approach sets out the hierarchy in preferential order depending on the type of development proposed.

477: The hierarchy of centres will continue to be reviewed as part of the Development Plan process – this includes unbuilt centres such as at Grandhome which will only be established as a centre in the hierarchy once they are developed and brought into use. The updated retail study has reviewed the existing centres and amendments may be proposed accordingly.

483: Full analysis of the updated retail study will highlight any qualitative/quantitative deficiencies in retail offer, inform any review of the current network of centres and boundaries in conjunction with reviewing the city centre boundary.

596: Current policy does restrict commercial centres to bulky goods only. This change was made during the examination of the extant ALDP. We intend to modify the role to support and promote a wider range of uses within them. The Council remains committed to supporting town centre first approach and applying the hierarchy of centres and sequential approach to development proposals for significant footfall generating development. Full analysis of the updated retail study will inform proposals to amend the current policy approach.

#### Q10: Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?

3, 18, 20, 22, 37, 96, 138, 271, 284, 291, 318, 361, 366, 367, 368, 422, 445, 449, 456, 472, 478, 479, 480, 544, 549, 554, 560, 562, 563, 574, 599: Support for continuation of approach is welcomed.

96, 368, 469, 471, 476, 480: Full analysis of the updated retail study will highlight any qualitative/quantitative deficiencies in retail/commercial leisure offer and inform any review of the current network of centres and boundaries. Proposals for commercial leisure uses are required to follow the hierarchy of centres and sequential approach. Support is already provided to leisure uses within the 'Beach and Leisure' zoning.

138, 318, 469, 473, 476, 480, 574: Proposals will be assessed on a case by case basis in line with the hierarchy of centres and sequential approach.

318, 422, 456, 472: Comments relating to condition of existing centres are noted. Where centres are outwith the control of Aberdeen City Council upgrades cannot be enforced. However policy provision can provide encouragement and confidence to potential investors of the type of proposal likely to be supported.

318: Allocation bids for inclusion in the emerging ALDP will be assessed accordingly.

471: Comments regarding the night time economy are dealt with in Issue 9.

476: The Council remains committed to supporting town centre first approach and applying the hierarchy of centres and sequential approach to development proposals for significant footfall generating development. Proposals within the beach and leisure zoning would be considered edge or out of centre and would be assessed as such – there may also be a requirement for an impact assessment/statement depending on the scale and nature of the development proposal. Full analysis of the updated retail study will inform proposals to amend the current policy approach. It is not intended to remove the presumption against retail development in the beach and leisure zoned area.

574: Where large development sites are promoted through the ALDP, infrastructure requirements and stakeholder discussions take place with regards to sport and leisure provision.

599: There is already a network of sport/leisure facilities distributed through the city, suburbs and outlying communities. Where new development proposals are submitted these will be assessed in line with the Development Plan.

#### General City Centre/Retail Comments

3, 18, 20, 37, 110, 138, 284, 291, 318, 366, 390, 449, 457, 469, 473, 480, 562, 619: Comments on the city centre are noted. The long term vision for the city centre has been progressed through the CCMP and this will be imbedded into the emerging ALDP. There are a number of committed and proposed projects in the city centre which will help to create a better place for living, working and visiting. This will also be supported by the Aberdeen City Region Deal. It has to be recognised that the city centre is a complex and multi-faceted environment with many different private, public and voluntary sector stakeholders involved.

Consultation with stakeholders is welcomed. The Development Plan undoubtedly has a role to play in assisting to create the right physical and policy environment for future development proposals to achieve the development of quality places to enhance the social, economic, environmental and cultural attractiveness of the city.

Aside from the city centre and retail policies, there are other policies in the ALDP which relate to design, placemaking, shopfronts, the historic environment, air quality, active travel and transport. There are, however, areas outwith the remit of the planning system such as business rates and building maintenance, etc. Full analysis of the updated retail study will inform proposals to amend the current policy approach. Issue 9 covers proposals relating to the reuse of upper floors of Union Street and city centre living.

**Planning authority action/recommendation for Proposed Plan**

Examine the need for an active frontage policy to replace Union Street Frontages policy.

<b>Issue 9</b>	<b>City Centre Living, 24 Hour City and Visitor Attractions</b>
<b>Section of the MIR to which the issue relates:</b>	Sections 3.6 to 3.9
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Question 11 – How can we encourage more people to live in the city centre?</b>  Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?</p> <p>1, 18, 20, 138, 366, 367, 368, 385, 456, 469, 472, 478, 554, 560, 574, 596, 619: Agree with approach and support a document being produced.</p> <p>1. Repopulating the city centre is long overdue and would be welcome by many.</p> <p>2: Better parking options.</p> <p>18: Support promotion of provision of flats in upper floors of Union Street buildings, many of which are vacant or under-utilised. Mix of business is important to encourage CC living. Limit business which damage quality of life.</p> <p>20: Housing above street level.</p> <p>22: Make it a regulation to force owners to bring unused upper (and lower) floors back into residential use.</p> <p>37: There need to be places to go when there is nice weather (outdoor places to sit, eat and drink).</p> <p>138: If a healthier environment can be created in the city centre. Air pollution would need to be reduced. Conversion of buildings from commercial to residential use should include good sound insulation and appropriate security measures.</p> <p>284: Free parking</p> <p>291: Deal with crime and late night behaviour.</p> <p>291: Improve and reduce cost of parking.</p> <p>291: Document not required – just fix it.</p> <p>318: A document would only work if it offered a workable route forward.</p> <p>361: Flats should be better quality and more attractive. Refurbish older flats. Building Standards Regulations are satisfactory (principles).</p>	

366: A document would be useful and we should be encouraging more people to live in the city centre but HMOs should be limited and conversions must adhere to strict and high standards to ensure that residential properties are maintained.

367: Provide good quality accommodation for purchase and rent. Provide amenities (schools, community buildings). Minimise traffic. Improve quality of the environment. A document would be helpful.

368: Provide attractive affordable housing with necessary services and facilities within walking distance. Document should set out standards required to be met for conversions.

385: Historic Environment Scotland offer to assist in production of document and cite the usefulness of the "Managing Change in the Historic Environment: Use and Adaption of Listed Buildings" guidance note.

422: Strongly encourage any opportunities to strengthen the city centre as an attractive, welcoming, green and walkable environment and strengthen linkages between existing greenspaces and water environments (coastal and river). An improved environment will attract more people to live in the city centre. CCMP goes some way to address these aspirations. Town Centre Toolkit and its principles may be a useful resource.

445: Development must appeal in terms of layout, appearance and cost.

449: Provide houses and flats in buildings that currently stand derelict and improve Union Street.

451: Provide good quality accommodation in a location not detracted by bad behaviour at night plus local stores within easy walking distance.

456: A marketing campaign to promote a new generation of city centre living should be considered important.

457: Population density is already too high. Cannot place more people in the city centre.

469: Document would be useful but must set high standards of what is expected of developers: energy efficient, carbon zero, with good access to transport, good outdoor space and indoor space.

471: Support residential uses in the centre for all society young, old, single, families etc. Mixed properties can support a thriving neighbourhood e.g. Edinburgh New Town. Encouraging both commercial and residential activity into the centre will result in overdevelopment.

478: Support more people to live in the city centre in principle to help enhance overall sustainability and viability of the area. However, residential use must be located so as to not undermine existing uses and particularly noise-generating and/or night time uses e.g theatres, bars, clubs, cinemas etc. Unreasonable restrictions placed on such venues to protect residential amenity of new properties can lead to closure which could compromise

role and function of the city centre. 'Agent or Change' principle protects venues from such conflict. Arts and cultural uses are vulnerable but are also key visitor attractions and provide both direct and indirect employment. Retail market is increasingly challenging and town centre uses should be retained and protected.

479: Add bus routes that avoid the city centre e.g by routing along Anderson Drive. This will reduce traffic and footfall in the town centre making it a more pleasant place to live.

543: Provision of adequate green space and green infrastructure can encourage people to live in urbanised areas. These benefits are well-recognised. Authority should consider incorporating trees into the city centre where infrastructure allows this. Respondent notes the ambitions set out in the Scottish Forestry Strategy 2019-29. The ALDP has the opportunity to increase tree canopy cover across the city – this will help meet the ambitions of the strategy.

549: Pedestrianisation of streets and control of antisocial behaviour.

560: Make is an attractive, safe place to live. Would be good to see people living in the city centre again.

563: Incentives offered for new build homes is damaging the housing market (city centre) and until controlled by regulation the trend of people moving outwith the city centre to the suburbs will not stop. Development to the west of Aberdeen on green belt needs to stop.

574: Provide good quality accommodation and better public transport across the city.

619: Supportive of more people living in and visiting the city centre and recommends collaboration with local residents to help achieve this.

### **Main Issue 1 – Living in the City Centre**

Should we provide a policy in the LDP supporting residential development in the city centre, including conversion of upper and basement floors of premises to provide residential accommodation?

Option 1 – Support for residential use is outlined within SG/local planning advice documents.

Option 2 – Include in policy the support for residential use in the city centre, and the conversion of upper floors to residential accommodation in the LDP and identify opportunity sites with residential uses.

Option 3 – There is no need for a policy within the LDP or other planning documents.

1, 3, 18, 20, 37,99, 138, 284, 361, 366, 445, 449, 456, 469, 471, 472, 473, 478, 480, 488, 560, 563, 591, 599, 610: Agree a policy should be included in the LDP.

441, 478, 542, 549: Option 1

18, 22, 138, 271, 318, 361, 366, 367, 368, 385, 445, 451, 456, 469, 471, 472, 480, 544, 552, 554, 560, 562, 563, 574, 591, 599, 610: Option 2

291: Option 3



99: It will maximise the number of people who can walk and cycle to work and shopping etc.

138: If a healthier environment can be created in the city centre. Potential fire risks from shops above or below residential accommodation and waste disposal should be considered. Below-pavement recycling bins used in some European cities should be considered.

284: There are many empty units, which is a waste.

318: Advise against basement accommodation on practicality principles.

366: Supports quality development and limited HMOs.

390: More residential accommodation would increase vibrancy of the city centre.

451: Agree that city living should be encouraged. Bring back into use of unused upper floor levels to suit a variety of residents. The attractiveness of the area needs to be appropriate. Safety, amenity and convenience shopping in close proximity.

456: There must be scope to create and develop 'loft' style living accommodation, traffic free and green zones within the city centre.

469: Encourage reuse of spaces but ensure this is not only basements and roof spaces. The policy must set high standards of what is expected of developers: energy efficient, carbon zero, good access to transport, good outdoor and indoor space.

471: Should encourage residential opportunities for all ages.

471: Encouragement should be given to properties of different sizes, not only small flats. Suggests revisiting the Tall Buildings policy as existing iteration seems to encourage inappropriate development in the city centre.

473: Developing long term empty buildings should be a new approach. Sites which have been long term vacant with little change of commercial use or benefit should be permitted for conversion to residential use. This would contribute to boosting the city centre population.

478: Residential use must be located so as to not undermine existing uses and particularly noise-generating and/or night time uses e.g theatres, bars, clubs, cinemas etc. Unreasonable restrictions placed on such venues to protect residential amenity of new properties can lead to closure which could compromise role and function of the city centre. 'Agent or Change' principle protects venues from such conflict. Strongly encourage requirement for evidence and justification regarding a space is surplus to requirements for non-residential use and that it will not undermine the future viability of the host unit or its surroundings.

480: Providing support for residential development should not compromise the ability of commercial premises to operate uses associated within the evening and night time economy (e.g music, entertainment, restaurants, pubs, clubs, cinema etc).

488: This is already a commitment of the authority, through existing guidance, therefore does not represent a change of direction for policy. City centre conversion or uptake of opportunity sites should not be promoted at the expense of land for new housing development to meet the need and demand identified within the SDP for new homes in the city. Increasing city centre living will have positive placemaking, health and well being impacts, but is unlikely to substantially support the delivery of homes, therefore support for, and allocation of new homes across the city must also be promoted.

544: Option 2 ensures best use of existing buildings and existing public services/infrastructure and accords with the WHO healthy cities principles offering public spaces, participation, cultural development and walkability.

552: There should be recognition of the growing number of residential premises being used as Air B'n'B. Licensing requirements should be considered to ensure fairness with the hospitality sector and avoid residential areas becoming transient and less like communities.

560: Not all buildings can be made accessible re: upper floor conversions. Unsure if basements would be desirable.

591, 610: Shows support for aims of the CCMP. New policy should provide flexibility to attract a range of uses to the city centre to boost its existing retail offering. Tentatively welcomes Policy NC9. Flexibility must be demonstrated when assessing levels of residential amenity in recognition of dense urban form and restrictions in achieving external amenity space particularly within conversions of existing non-residential buildings. City centre developments (conversions or redevelopment of brownfield sites) should not be promoted at the expense of greenfield sites which are free from constraints and deliverable. Principles of city centre living are to be supported and encouraged however they are unlikely to significantly support delivery of new homes.

610: Need to ensure balance of family living. Cites example from the past where family housing provision was catered for in Aberdeenshire due to lack of provision in Aberdeen City.

### **Question 12 – Residential Development in the City Centre**

Are there any other locations within the city centre where residential accommodation could be provided?

20: As large shops close, residential opportunities will arise.

284: No new development.

291: Yes, but stop planning for increasing numbers of people.

318: Derelict warehousing around the harbour could be development to provide accommodation appropriate for the city and beach.

361: Although outwith the city centre boundary the respondent suggests West End locations Albert Street, Carden Place and adjacent streets could be considered for conversion back to residential living.

366: No locations identified.

449: Unused office space within historical houses.

451: Opportunity to reconvert offices back to their original residential use.

469: Offices within Riverside House on Riverside Drive which have been vacant for 2 years.

471: Although outwith the city centre boundary the respondent suggests West End locations Queens Road, Carden Place etc could be considered for conversion back to residential living for all ages. Offices are no longer sought after in these locations.

482: North Dee. Development Framework supporting document enclosed with response.

554: Most streets on and around Union Street.

563: Support preferred housing sites in the MIR.

596: Clarification sought as to whether major residential development outwith the areas identified by the CCMP would be supported in principle.

599: Primary requirements are employment, affordable housing, effective transport and an attractive and vibrant city centre.

### **Main Issue 2 – A 24 Hour City**

Should 24 hour activities in Aberdeen be supported and encouraged to grow, especially in the city centre? Could this be achieved through a policy?

Option 1 – High footfall generating developments are supported by Policy NC1: City Centre – Regional Centre.

Option 2 – Establish the requirement to support and encourage the evening and night time economy through policy.

20, 291, 366, 367, 457, 479: Do not support 24 hour activities

366: Should not be encouraged. Current licensing hours are already too generous and antisocial behaviour is cited.

457: 24hr city equals 24hr crime.

469: Do not support a 24hr city. Balanced approach required. Striving to achieve 24hr city may make the city centre an undesirable place to live. 24hr activity will disturb residents and may drive people out of the city. There are many indicators of a prosperous city (other than growth) including life work balance, pleasant environment to live and raise families etc. Employees working late/early to provide 24hr city will usually be paid low wages and may impact on health and well being.

471: Do not support the centre becoming a 24hr activity zone. This will lead to a poorer and more threatening environment. Policy should not encourage over use of the centre as a 24hr night time pleasure park. A 24 hour city is not needed.

521, 575: Concerned about lack of importance placed on anti-social behaviour problems faced by city centre residents. The MIR does not indicate how these issues are to be dealt with. Examples are provided over issues experienced over a number of years. Respondent notes that most of the report focuses on a 24hr economy for the city centre, enhancing the night local economy and safety of pedestrians when interacting with vehicular traffic. There is very little about anti-social behaviour issues which will become worse with this proposal. Disagrees with report where it cannot be demonstrated how family living in the city centre will be improved. Contradicts the Councils Antisocial Behaviour Investigation Team charter. There is a conflict between aspirations for the future of the city centre, antisocial behaviour and family living. Respondent requests formal communication on whether the 24hr economy is planned for the area around Bon Accord Terrace and whether this is linked to the EN03 Roads Project.

549: No. Presumably 24hr activities relate to alcohol sales and gambling. These may generate revenue for the city but the costs in terms of loss of amenity, crime and disorder, and health effects are too high.

361, 445, 478, 480, 554, 563: Yes

478: Should be supported and protected through policy. They help support overall vitality of Aberdeen and help attract and retain people within the local area.

480: High footfall generating developments should continue to be supported in the city centre. Policy could look to identify areas which are considered most suitable to accommodate 24hr activities (with caveats to protect reasonable level of amenity for existing and planned residential and/or sensitive occupiers). Bon Accord Centre would be an obvious area of consideration for promotion of 24hr activities in the city centre retail core.

3: Unsure, there must be a balanced approach.

18: Careful balance required. 24 hour activities can damage quality of life.

22: More policing required.

37: Cannot see a market for this.

138: Respondent notes potential conflict between 24 hour city and encouraging more people to live in the city centre. Younger people may find city centre living an attractive option but its unlikely to appeal to families and older people. Respondent queries how residential amenity will be assured during the night and notes that stricter regulations and policies on licensing may be needed in some areas to encourage a broader range of residents.

284: Only if they are quiet activities.

318: Selectively. Policy guidelines need to be in place.

368: Within reason. Venues open in early hours should be restricted to certain areas largely away from residential areas.

390: If there is increased residential accommodation then 24 hour activities should not be encouraged.

451: Might be a good idea but not if it results in antisocial behaviour e.g Belmont Street.

456: If not 24hr, then perhaps 18hr activities encouraging café style businesses to flourish.

473: There is little demand for a 24hr. Population is not sufficient to make it profitable.

542: Respondent queries whether those living in the city want a 24hour city and whether there is any coordination in the local development plan.

544: The ambition for a 24hr city appears consistent with the CCMP. Primary public health issues would be to ensure consistency with alcohol licensing legislation and assurance for community safety.

552: Policy should encourage pedestrian areas of the city centre, promote cycling over car usage, improve lighting and social spaces. Policy should include quality grading and positioning of new hotels/hostels. Low quality grading in the city centre will downgrade the price expectation and lead to a lower quality night time experience.

576: Provides context on discussions with Aberdeen City Council officers regarding EN03. There remains uncertainty about the possible location and extent of 24hr activities – specifically whether planned pedestrianised streets at Langstane Place and Justice Mill Lane et al are included. Maps have not been provided. Definition of the proposal is requested for both pedestrianisation and 24hr activities. Concerns are raised regarding impact on residents of alcohol driven antisocial behaviour. Notes the CCMP did not indicate aspirations for a 24hr economy. Affirms right to live free of antisocial behaviour. FOI request attached to representation.

594: Concerns outlined regarding 24hr economy and EN03. An increase in footfall throughout the area would impact on the families living in the vicinity and lead to further incidents of antisocial behaviour.

619: Need a greater variety of activities (entertainment, leisure, recreation, leisure etc) which should not depend on the consumption of alcohol. These could be directed towards development zones following dialogue between planning and licensing. Cites health benefits and benefit to economic success and sustainability as there is increasing demand by visitors for activities which do not depend on alcohol.

627: Clarification needs to be made that the 24hr city applies only to the city centre. It would be inappropriate to introduce to areas outwith the city centre.

629: Objects to 24hr city proposal in vicinity of Justice Mill Lane and Lanestane Place. This will lead to increase of antisocial behaviour and infringement of human rights. Respondent recognises that businesses and residents can co-exist but the balance has been overstepped at times. Objects to EN03 roads pedestrianisation project as this will increase late night traffic in the vicinity. Combination of EN03 and 24hr business will exacerbate issues.

22, 271, 366, 441, 542, 549: Option 1

18, 138, 318, 361, 367, 368, 445, 456, 472, 478, 480, 544, 552, 554, 560, 563, 574, 599: Option 2

### **Question 13 – Encourage the creative arts**

What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen city centre is like no other place?

3: Reduce the grey buildings. Encourage colourful, artistic, striking murals especially on blank end gables. Refers to success in Glasgow and Banksy. Anything we can do to make Aberdeen less grey is good. Iconic art and achieving iconic art should be promoted in Aberdeen.

5: Change the attitude of the population. The majority has little cultural or creative appreciation, hence low level of attendance/participation in events.

20: The Council has no money to do this.

22: Follow up on Nuart.

110: Provide space in buildings on Union Street that people can use as pop-up artistic centres to encourage small businesses or sole traders to use them. This would enhance the appearance of Union Street and add character.

284: Stop cutting funding for schools music and make music lessons free.

291: Clean up the city and reinvigorate Union Street.

318: Planning process seems directed at conformity rather than uniqueness. The city needs to be clean, welcoming, safe and accessible to all classes, cultures and ages. Aberdeen could be a tourist destination and should refocus on what it has and not compete with other cities trying to be the same e.g. technology hub.

361: Provide grants and support to the appropriate bodies.

366: Investigate more sponsorship opportunities within business in Aberdeen. Push for more funding from Government.

367: Continue to support niche festivals throughout the year. Advertising cylinders used in the city centre are useful to remind of planned events. Contrast granite grey buildings with

colour, vibrancy and variety of the arts events. Volunteers could help connect visitors and residents with arts events taking place – cites Hull as successful example during 2017 UK City of Culture.

368: Avoid closure of major visitor attractions at the same time e.g Art Gallery and Music Hall.

368: More publicity about what is on. Do not rely on social media.

422: Encouragement of creative arts would form part of a wider objective to create a more sustainable, attractive and welcoming city centre.

449: Upscale events such as Nuart and Jazz Festival. Cites disappointment regarding no extra seating at these events or 'pop-up' food retailers.

456: Create a new artistic style culture around the city centre to encourage artists to relocate to Aberdeen and spread the culture. Aberdeen currently does not enjoy a comparative artistic reputation – partly due to geography. Suggest collaboration with Scandinavian countries.

457: Aberdeen needs more Theatres to attract world class talent.

471: Provision of cheap studio space and offices in a location that is attractive with granite buildings. Broadford Works?

554: Continuation and growth of festivals and permanent installations.

562: Increased space for group/organisations to be based in Aberdeen. Increased space for smaller cultural events throughout the year and an annual programme of cultural events.

563: Aberdeen needs to be a welcoming place to visit. At night Aberdeen can be a threatening and dangerous place and this will need to change to support the recommendations in the MIR. There should a policy to promote the creative arts.

574: Create more art and cultural centres. Support street art in public places.

599: Support aim. It may be challenging given Aberdeens comparatively low population. Lessons could be learned from other places who have grown art beyond the norm for places of their size. Cites examples of successful places.

613: Provide grants and business support to creative businesses. Explore live/work studio accommodation.

619: Supports encouragement of creativity, culture and artistic expression. Suggests this is brought forward with Aberdeen City Cultural Strategy with regards to supporting performers.

#### **Question 14 – Proposals for creative arts**

Are there other buildings or areas within Aberdeen that could accommodate the existing and support an emerging creative sector, for desk based and studio based artists?

- 20: Renovate the Arts Centre and other city centre buildings when they become available.
- 22: Identify potential premises. Involve Gray's School or Art and develop an artistic ONE.
- 110: Vacant BHS building could be a space to provide studios and small shops/stalls.
- 318: The harbour, Torry area overlooking the harbour. The banks of the Dee as it enters the harbour. Old Aberdeen around the University.
- 361: With reference to CCMP, the Shore Porters buildings is in a good location and a good suggestion.
- 366: Convert Woolmanhill Hospital to an artists quarter with workshop and gallery facilities instead of planned housing/hotel.
- 368: Union Street or Shore Porters may be appropriate although Shore Porters is not as accessible.
- 368: Utilise indoor bowling centre in Bon Accord Shopping Centre. This is both central and has a high footfall nearby.
- 390: The Market could be used to encourage creative arts and independent businesses.
- 471: Broadford Works, Westburn House and others.
- 554: Union Street, the Green and empty retail units in shopping centres e.g Galleria and The Academy.
- 560: Empty shop units at Gallery and the Academy.
- 574: Scottish Water Pump House in Cults for a new creative centre. Support creation of a museum showcasing the quarrying and use of granite in Aberdeen at the Rubislaw Quarry. Promote creation of a dedicated oil & gas exploration and production museum (perhaps expand the area within the Maritime Museum).
- 613: Fund spaces in existing cultural venues (gallery, theatre etc) and partner with University to provide creative spaces

**Question 15 – Percent for Art**

To ensure Aberdeen city centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/visible place or places within the development?

- 3, 5, 18, 22, 138, 361, 366, 367, 368, 390, 469, 549, 554, 560, 563, 574, 599, 613: Support
- 18: Adds to quality of life and represents excellent value for money.



367: Arts projects should be tailored for Aberdeen and its heritage – should not be generic that could be situated in any city. Cites leopard sculptures from the Aberdeen City coat of arms.

390: If consultation carried out. Perhaps more than 1%

549: This has the potential to really enhance public spaces.

574: Culture is good for public wellbeing as evidenced by positive reaction to Nuart.

599: Suggests the funds be given to a civic organisation to curate works and deliver a programme of events rather than burdening developers who do not have core skills in this area.

271, 291, 488, 565, 591, 610: Do not support.

271: Would not meet comparable tests to Planning Circular 3/2012 for City Centre infrastructures projects which may also not have practical locations for display due to their design or purpose.

451: Concept of compulsory public art sounds awful and could well result in committee approved 'art'.

451: Aside from good intentions, it does not seem an appropriate way to commission art work.

471: This, and a policy, is not required. Developers should be encouraged to develop in a sensitive way that supports granite heritage without having to provide a percent for art. Good design should be encouraged through the planning policies.

488: Do not support the proposal. Supports placemaking aspirations but the requirement for a percentage to be spent on public art is overly prescriptive and disproportionate to the benefit that would be achieved. Understand the intention is for the policy to be applied to larger scale commercial development within the city centre. Suggest the LDP provides a more flexible way of delivering placemaking aspirations through new development. Focus on the proposal itself rather than the level of funding requirement to spend on public art.

565: There is already a significant strain on developer contributions. If a further contribution was introduced it would likely affect other contributions such as open space, core paths and affordable housing. If a policy is required, respondent suggests this be brought in on a voluntary basis and applicable to commercial and city centre developments.

591, 610: Object to proposal and Policy NC12. Such a contribution would be onerous and disproportionate. Focus should be to ensure the overarching placemaking agenda contained within LDP policies are delivered within developments across the city. Uncertain of the circumstances in which the policy would be applied – developments location within the defined city centre boundary or all developments? If a policy is to be implemented it should clearly distinguish that it relates only to city centre development.

591: Although not specifically stated in the draft policy wording, it is understood the intention is for the policy to apply to large scale commercial development within the city centre. Commercial development does not yield developer contributions on education and community facilities and in this respect a percentage for art policy is likely to be more viable.

20: Possibly. Other obligations (affordable housing, access, parking) should be fulfilled first.

138: 1% is a very modest contribution. Designs of new buildings need to be more imaginative and interesting. Notes the high number of functional rather than artistic glass boxes in the city and recommends Barcelona and Berlin as examples of artistic cities.

318: Where appropriate funding should be responsibility of Aberdeen City Council and not a burden placed on contractors and developers.

384: Percentage for art requirement would create potentially significant issues for the funding of Network Rail development projects if extended to railway developments. Recent projects have been in excess of £1million. Network Rail request exemption as a publicly owned/funded company and due to considerable public benefits arising from railway developments.

445: Not sure this is a good idea. Another form of tax.

456: Perhaps but would require flexibility. Certain industrial estate locations around the city will not be appropriate backdrop for artistic endeavours.

544: Largely supportive of art provision being a requirement of large developments. Notes the Board involves Grampian Hospitals Arts Trust to create arts strategies for all its major developments. However, allocating 1% of the budget may not always be seen as the best use of public funds. Do not support an arbitrary figure being imposed.

562: It might be a good idea for commercial developments within the city centre boundary to contribute to a central fund for art projects in the city.

565: Unclear if this proposal would relate only to developments in the city centre and to which type of developments it would relate.

613: Advice and support to developers re commissioning, attracting and contracting high quality professional artists and craftsmen should continue to be provided by cultural and planning teams.

### **Main Issue 3 – Support for Visitor Attraction**

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?

Option 1 – High footfall generating developments are supported by Policy NC1: City Centre – Regional Centre.

Option 2 – Establish a new policy to support and encourage visitor attractions

3, 5, 22, 37, 284, 318, 361, 366, 445, 451, 456, 552, 560, 563, 574, 599, 613: Agree

291: Disagree

271, 441, 542: Option 1

18, 22, 361, 366, 367, 368, 445, 451, 456, 469, 471, 472, 549, 552, 554, 560, 562, 563, 599, 613: Option 2

### **Policy Comments**

318: Policy should clearly define what the objectives for next 10 years are.

451: Should extend beyond the core town centre elements. Old Aberdeen is an important tourist venue.

471: Should probably have a policy but ensure it is protective over the existing granite heritage.

549: A new focused policy is needed.

552: Queries whether planning policy supports an environment designed to complement the tourist vision for the region. The LDP has several references to use class 7 but no reference to how the LDP will specifically support sustainable accommodation provision. Cites VisitAberdeenshire targets and notes sustainable growth principles and Aberdeen Economic Policy Panel report of hotel occupancy, rates and the Destination Strategy.

552: Investment in hospitality and tourism premises will be critical to secure interest from target markets. A clearer focus on the quality levels of accommodation desired for the City will be essential to deliver a sustainable tourist vision. Equally, overprovision, particularly lower banded, will increase pressure on room rates and profitability.

552: Cites example of other LDP policies which have presumption against additional visitor accommodation in certain areas of the City and concentrate investment into core areas. Edinburgh LDP policy is also cited.

552: Cites SDP context and supports a clear framework of hotel provision including quality standards for future provision and defining types of accommodation within certain zones of the City.

552: Tourism is already one of Aberdeens key growth sectors. To support its sustainability the LDP should prioritise high quality, niche or distinctive accommodation opportunities to generate growth and investment. LDP should specify types of hotel stock required to augment its offer and presume against uses which drive down rates and future investment opportunities.

563: Policy needs to be pro-active and make sure attractions are available to all and affordable.

574, 599: Requests to see policy detail before implementation.

619: Supportive of more people living in and visiting the city centre and recommends collaboration with local residents to help achieve this.

### **Other Comments**

5: The Council has a major role to play in stimulating fresh attitudes through significant developments but shows little sign of being actively involved in doing so. There is no vision for building on the City's heritage – examples of historic buildings neglected, artefacts stored outwith the centre. The Council failed to ensure Provost Skenes House and Marischal College were not overwhelmed by new development.

20: Desperately need visitor attractions for the future of the city and we need to preserve our granite heritage.

138: Notes the need for Aberdeen to promote itself as a cultural city as it has several cultural and historical attractions. Respondent recommends walking and bus tours involving the art gallery and museums and Union street to appeal to visitors. Signage is required to divert tourists from the AWPR into the city. Recommend the new harbour to be welcoming with transport available into the city.

291: Cities are not about “visitor attractions”, they are about shops and restaurants.

390: Notes lack of visitor attractions. More advertising is needed and increased number of attractions. There should be bus tours and increased accessibility to the city/beach. Suggest the beach should be invested in. Form a non-political group to oversee this.

445: New facilities for the city centre may be thwarted by lack of suitable space.

451: Creation of visitor attractions should be carefully considered if financial support from the Council is to be considered.

619: There should be further consideration to management of sustainable tourism to ensure that there is adequate provision in place for those visiting the city and ensure that this does not have a detrimental impact to those living in areas of interest e.g Fittie / Foot Dee and other areas in the city.

627: Support is needed to renovate the Anthropological Museum located within Marischal College – formerly and potentially a huge attraction for residents and visitors.

### **New Policy**

478: Suggest inclusion of an additional policy to protect Aberdeen's valued community, cultural and social facilities from unnecessary loss. This would include a requirement for robust evidence that a facility is surplus to requirements by the local community.

## Summary of response by planning authority:

### Issue 9 City Centre Living, a 24 Hour City and Visitor Attractions

#### Question 11 – How can we encourage more people to live in the city centre?

Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?

1, 18, 20, 138, 366, 367, 368, 385, 456, 469, 472, 478, 554, 560, 574, 596, 619: Support for the approach and a document being produced is welcomed.

422: Comments for the approach and intended outcomes are welcomed. Note the usefulness of the town centre toolkit.

1, 18, 20, 138, 318, 366, 367, 368, 385, 456, 469, 472, 478, 554, 560, 574, 596, 619: The parameters for this document are currently being investigated in collaboration with Building Standards and Masterplanning, Design and Conservation.

385: Historic Environment Scotland's offer to assist in production of a document is noted.

1, 18, 20, 37, 367, 449, 451, 457, 471, 574: The city centre masterplan (CCMP) aims to create a living city for everyone by increasing the opportunities for housing within the city centre, creating more liveable environments and making the city centre a more attractive place to live. The main issues report provided draft policies and indicated options for providing a more flexible approach to acceptable uses in the city centre, identifying the CCMP intervention areas and bringing vacant properties back into use in the city centre. Comments received to these options will frame the Proposed ALDP policies.

367, 368: Provision of amenities is paramount to support residential living. Supporting an increased level of residential occupation in the city centre will equally support and encourage the use of existing community facilities such as libraries, community centres and schools.

361, 367, 368, 445, 451, 543, 574: Comments related to type of residential property and quality are noted. All development has to adhere to placemaking principles and the extant local ALDP follows a design led placemaking policy approach. A mix of unit types, tenures and sizes would be supported, to ensure there is variety of living accommodation.

361: Building Standards are a separate legislative process.

22: The planning system has no remit to force owners to bring unused upper (and lower) floors back into residential use.

291, 451, 549: Policing and anti-social behaviour is outwith the remit of the planning system.

291, 451, 471, 478: The CCMP aims to create a more liveable environment for residents and visitors alike. A movement towards extending opening hours increases opportunity for a diverse range of economic activity and keep life in the city centre outwith 9-5. The key issue is to get more people living in the city centre to support an economy based around day to day living. Agent of Change principle would apply and appropriate residential amenity must

be maintained. The main issues report included a draft new policy specifically on 'Amenity' for comment.

471, 478: The city centre will remain the focus for all significant footfall generating development in line with national policy.

18: With regard to limiting business which damage quality of life, all proposals would be considered on their own merits in accordance with the Development Plan. Agent of Change principle would apply and appropriate residential amenity must be maintained. The main issues report included a draft new policy specifically on 'Amenity' for comment. The planning system has no remit with regards to licensing issues.

#### Transportation

2, 138, 284, 291, 549: Parking provision is considered as a matter of course when assessing development proposals. The CCMP 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 which exacerbates traffic problems in the area.

291: The planning system has no remit with regards to cost of car parking.

138: The city centre is one of three Air Quality Management Areas (AQMAs) in Aberdeen. The city centre is currently highly accessible by walking, cycling and public transport and the proposed 'zero parking' for new development will help facilitate a more attractive centre that is also safer for pedestrians and reduces pollution. It will also help achieve the objectives set out in the CCMP.

478: The emerging ALDP can only consider land use planning issues, bus routes are outwith this remit. The CCMP promotes the improvement of sustainable transport and limiting the movement of private vehicles in the city centre.

574: Work is ongoing to produce a Sustainable Urban Mobility Plan to identify measures to encourage the use of transport by foot, bike, public transport or low-emission vehicles in line with the aims of the CCMP.

478: It would not be sustainable to reduce public transport options in the city centre. The city centre also remains the focus for all significant footfall generating development. As such we would not wish to encourage a reduction of footfall in the city centre. We wish to encourage a diverse and wide mix of uses to support both residential living and the city's economy.

366: The HMO process in Aberdeen City Council is a joint process between licensing and planning permission. The emerging ALDP can only consider HMO issues related to land use. Issue 19: Housing in Multiple Occupation considers comments received to the Main Issues Report.

456: Comments related to a marketing campaign are noted. The ALDP can only consider issues related to land use.

457: The housing supply targets are set by the Aberdeen City and Shire Strategic Development Plan and the emerging ALDP must accord with these.

543: Comments related to increasing tree cover are noted. The extant ALDP already contains policies with regards to open space provision and green infrastructure and the Council is working on a strategy related to trees and woodlands and a city-wide climate adaptation framework. Further, the CCMP Public Realm Strategy details a planting strategy intended to mirror the historical layering of the city centre.

563: To meet the targets set by the Strategic Development Plan there will be a mixture of greenbelt and brownfield development. However, we do not anticipate the need to identify significant development over and above that which will be continued from the extant ALDP and this will focus on brownfield and small-scale greenfield allocations. The planning system has no control over incentives offered for new build homes.

### **Main Issue 1 – Living in the City Centre**

1, 3, 18, 20, 37,99, 138, 284, 361, 366, 445, 449, 456, 469, 471, 472, 473, 478, 480, 488, 560, 563, 591, 599, 610: Support for including a policy in the LDP is welcomed. Draft Policy NC9: City Centre Living was included within the Main Issues Report for comment. Note this has been renamed VC5: City Centre Living.

441, 478, 542, 549: Support for option 1 is noted.

18, 22, 138, 271, 318, 361, 366, 367, 368, 385, 445, 451, 456, 469, 471, 472, 480, 544, 552, 554, 560, 562, 563, 574, 591, 599, 610: Support for option 2 is noted.

291: Support for option 3 is noted.

99, 451, 469, 471, 473: The CCMP aims to create a living city for everyone by increasing the opportunities for housing within the city centre, creating more liveable environments and making the city centre a more attractive place to live.

138: Comments related to waste disposal, fire risk etc are noted. Each planning proposal will be assessed on its own merits and consultation with other council departments (e.g waste, roads) undertaken. Building Standards legislation would address safety issues such as fire. Parameters for a document outlining principles for converting a building into residential use are currently being investigated in collaboration with Building Standards and Masterplanning, Design and Conservation.

284, 469, 473: The main issues report provided draft policies and indicated options for providing a more flexible approach to acceptable uses in the city centre, identifying the CCMP intervention areas, bringing vacant properties back into use in the city centre etc. Comments received to these options will frame the emerging ALDP policies.

318, 451, 456, 473, 560: The current policy approach in the extant ALDP has a presumption in favour of proposals to use and upgrade vacant, under-used and sub-standard upper and lower (basement) floor properties into residential use within the city centre. There is no

significant change in policy direction proposed, however the attainment of suitable amenity must be demonstrated with residential proposals.

473: It is not possible to enforce the development of long term empty buildings, although the Council has appointed an Empty Homes Officer to address this issue. Where proposals are submitted these will be assessed on their own merits in accordance with the ALDP. The city centre remains the focus for all significant footfall generating traffic but we agree there is a need to balance the need for both economic development and residential uses in the city centre.

366, 451, 469, 471: Comments related to type of residential property, amenity and quality are noted. All development has to adhere to placemaking principles and the extant ALDP follows a design led placemaking policy approach. Each application would be considered on a case by case basis in accordance with the ALDP. The main issues report included a draft new policy specifically on 'Amenity' for comment. A mix of unit types, tenures and sizes would be supported, to ensure there is variety of living accommodation.

469: Comments related to standards including energy efficiency, carbon zero, access to transport, outdoor/indoor space are either already covered by existing policy provision to be carried forward or will be developed as part of preparing the Proposed ALDP.

471: It is an integral part of the ALDP preparation process to assess existing policies and promote amendment if considered necessary.

456: The CCMP 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 which exacerbates traffic problems in the area.

478, 480: The CCMP aims to create a more liveable environment for residents and visitors alike. A movement towards extending opening hours increases opportunity for a diverse range of economic activity and keep life in the city centre outwith 9-5. The key issue is to get more people living in the city centre to support an economy based around day to day living. Agent of Change principle would apply and appropriate residential amenity must be maintained. The city centre will remain the focus for all significant footfall generating development.

366: The HMO process in Aberdeen City Council is a joint process between licensing and planning permission. The emerging ALDP can only consider HMO issues related to land use. Issue 19: Housing in Multiple Occupation considers comments received to the Main Issues Report.

390, 451: Support is welcomed. We agree that we need to adapt our approach to balance the need for both economic development and residential uses in the city centre towards wider objectives of city centre living, vitality, vibrancy and viability.

488: Issue 2 – The Settlement Strategy discusses comments received to the spatial strategy. It is agreed that there is no step change in policy direction towards city centre



conversions. Due to the misaligned timescales in preparing and approving both the ALDP and CCMP it was not possible to fully imbed the CCMP. Thus, although there is no step change in policy direction, the context, focus and culture has changed and we now wish to be clearer on our aims for the city centre regarding city centre living and other matters.

552: The emerging ALDP will be prepared under current primary legislation, secondary legislation and regulations. Within these there is currently no remit to consider licensing arrangements with regards to Air BnB. Primary legislation is now in place for subsequent ALDP's to be prepared under the Planning (Scotland) Act 2019 which does contain provision for short-term let control areas. Work is now ongoing to progress secondary legislation and regulations.

591, 610: Issue 8: City Centre and Network of Centres discusses comments related to flexible uses within the city centre. Issue 2 – The Settlement Strategy discusses comments received to the spatial strategy. Flexibility of uses within the retail core and the city centre is being considered as part of the ALDP and in alignment with the objectives of the CCMP to support vibrancy, vitality and viability in our existing retail centres. Agent of Change principle would apply and appropriate residential amenity must be maintained. The main issues report included a draft new policy specifically on 'Amenity' for comment. A mix of unit types, tenures and sizes would be supported, to ensure there is variety of living accommodation.

### **Question 12 – Residential Development in the City Centre**

20, 284, 291, 318, 361, 366, 449, 451, 469, 471, 482. 554, 563, 596, 599: Comments suggesting locations within the city centre for provision of residential accommodation are noted.

361, 449, 451, 471: Issue 16: West End Office Area specifically discusses the increase in vacancies of office space in the West End as a result of new Grade A office developments in the city centre. The Main Issues Report preferred option encouraged a greater mix of uses in this location to promote the reuse of vacant buildings and vibrancy as a result of diversity of uses.

284, 291: The housing supply targets are set by the Aberdeen City and Shire Strategic Development Plan and the ALDP must accord with these.

318: Current policy provision does not preclude residential development around the harbour area although there is a presumption in favour of harbour related development. Proposals would be considered on their own merits in accordance with the Development Plan. Agent of Change principle would apply and appropriate residential amenity must be maintained. The main issues report included a draft new policy specifically on 'Amenity' for comment.

482: North Dee, as an intervention area within the CCMP, will likely be identified as an opportunity site in the Proposed ALDP.

596: Major residential development outwith areas identified by the CCMP would be assessed on their own merits, and in accordance with the Development Plan, should a proposal come forward.

## **Main Issue 2 – A 24 Hour City**

3, 18, 20, 22, 37, 138, 284, 291, 318, 361, 366, 367, 368, 390, 445, 451, 456, 457, 469, 471, 473, 478, 479, 480, 521, 542, 544, 552, 554, 563, 575, 576, 594, 619, 627, 629: Comments related to 24hour cities are noted.

22, 271, 366, 441, 542, 549: Support for option 1 is noted.

18, 138, 318, 361, 367, 368, 445, 456, 472, 478, 480, 544, 552, 554, 560, 563, 574, 599: Support for option 2 is noted.

3, 18, 20, 22, 37, 138, 284, 291, 318, 361, 366, 367, 368, 390, 445, 451, 456, 457, 469, 471, 473, 478, 479, 480, 521, 542, 544, 552, 554, 563, 575, 576, 594, 619, 627, 629: The CCMP aims to create a more liveable environment for residents and visitors alike. In the context of a changing retail scene where the high street used to be driven by retail we must look at other strategies to revitalise our city centre. The city centre will remain the focus for all significant footfall generating development. A movement towards flexible opening hours increases opportunity for a diverse range of economic, leisure and cultural activity and keep life in the city centre outwith 9-5. The key issue is to get more people living in the city centre and creating an environment where people feel safer to linger for longer to support an economy based around day to day living. Encouraging a day and evening economy by creating vibrant and safe places is an important consideration for all new developments. Well designed quality spaces, public realm and sustainable access is key to improving the economic potential and environment of the city centre. Improving the city centre is complex and flexible opening hours is one of many other strands which when combined form a strategy to create a livelier city. Other strategies proposed by the main issues report for comment relate to repopulating the city centre, diversifying uses in the city centre and refocusing the retail core for example.

549, 576, 619: From the comments received there appears to be uncertainty over the intention of the policy and indeed what types of uses/developments are being actively encouraged. Evening economy relates to a wide and diverse range of activities including cafes, restaurants, bars, nightclubs, theatres, cinemas, museums, libraries, shops etc. All of the aforementioned have a role to play in creating sense of place important to local residents and visitors alike.

138, 284, 480, 576, 594: Agent of Change principle would apply and appropriate residential amenity must be maintained. New development will have to consider how they can co-exist alongside existing uses. The main issues report included a draft new policy specifically on 'Amenity' for comment.

18, 22, 284, 469, 544, 549, 576, 594, 629: With regard to limiting business which damage quality of life all proposals would be considered on their own merits in accordance with the Development Plan. The planning system can only consider issues related to land use and has no remit with regards to licensing issues, policing, or employee wages and separate legislative processes are in place for these.

552: Regarding specific quality grading of hotels – the level of detail is not suitable for inclusion within the ALDP.

451, 457, 471, 521, 549, 575, 629: As a result of flexible opening hours, improved public realm and public spaces, increased residential occupation of the city centre there will be an increased level of use and surveillance of public spaces which should go some way to allay fears of an increased level of crime.

368, 480, 627: The intention of the policy is to be limited to development within the city centre. Locations outwith the city centre are unlikely to accord with the policy tests of being located close to taxi ranks and/or convenient night time public transport.

576, 594, 629: Project EN03 is an environment led project relating to enhancing pedestrian priority with cycle routes, improved streetscape and lighting. Improving the environment around areas which are open late at night will improve safety and access for both the users and workers.

3, 18, 20, 22, 37, 138, 284, 291, 318, 361, 366, 367, 368, 390, 445, 451, 456, 457, 469, 471, 473, 478, 479, 480, 521, 542, 544, 552, 554, 563, 575, 576, 594, 619, 627, 629: The Proposed ALDP will seek to increase the diversity of uses in the city centre to include uses which generate significant footfall and promote vitality, whilst protecting existing Class 1 retail uses where appropriate. Encouraging a more varied mix of uses with flexible opening hours and increased footfall will help to create a livelier city centre; reduce the need to travel; help to reduce expenditure leakage; address challenges from changing trends and customer habits; and competition from online shopping. Encouraging a repopulated city centre; improving public realm, streetscapes, and green spaces; and raising design standards are also key factors in attracting further inward investment. All of which helps to increase footfall, the use and demand for services and facilities, and social interaction. By making it an appealing place to live, to work and to visit and by providing a high quality environment with good infrastructure, the City will attract new business and investment and provide a unique visitor experience for residents, and visitors to the City.

In light of comments received the policy and contextual information will clarify the focus of the policy and what types of uses/developments are being actively encouraged. Evening economy relates to a wide and diverse range of activities including cafes, restaurants, bars, nightclubs, theatres, cinemas, museums, libraries, shops etc. All of the aforementioned have a role to play in creating sense of place important to local residents and visitors alike.

### **Question 13 – Encourage the creative arts**

3, 5, 20, 22, 110, 284, 291, 318, 361, 366, 367, 368, 422, 449, 456, 457, 471, 554, 562, 563, 574, 599, 613, 619: Comments related to supporting and encouraging the creative sector are noted.

Aberdeen City Council are supportive of cultural and creative strategies and work alongside a variety of partners to bring a programme of events forward such as Nuart, Spectra, Look Again, Jazz Festival, North East Open Studios and Tech Fest. In 2018, Aberdeen City Council approved a 10 year strategy “Culture Aberdeen – A cultural strategy for the city of Aberdeen 2018-2028”. This lists 5 key ambitions for Aberdeen over a 10 year period to challenge and support the cultural sector.

With regards to land use implications we intend to support a re-balance of uses within the city centre to support vibrancy, vitality and viability of our city centre and existing centres. Current policy provision already supports the principle of these uses within the city centre and will continue to do so in the emerging ALDP without the need for an additional policy. In light of the recent approval of “Culture Aberdeen” strategy, investment to the Art Gallery, Music Hall and Satrosphere, and continued support for the intervention areas within the CCMP we intend to expand the City Centre section of the emerging ALDP with regards to the creative and cultural sector. Specific projects are also identified within the CCMP and will be assessed on their own merits in accordance with the Development Plan as and when they come forward.

3, 5, 20, 284, 361, 366, 367, 368, 449, 554, 562, 613: Comments on the colour of the buildings and cleanliness within the city, attitudes of residents, publicity, marketing, funding, events programme and festival specific comments are noted. These are outwith the remit of a land use planning document. We aim to support the aims and objectives of other approved strategies and provide a positive policy framework to support proposals as and when they come forward in balance with ensuring our historic city is both conserved and complemented. We must also be cognisant of other relevant legislative processes such as conservation areas, listed buildings or occupying a road or footway with regards to permanent installations of public art.

#### **Question 14 – Proposals for creative arts**

20, 22, 110, 318, 361, 366, 368, 390, 471, 554, 560, 574, 613: Comments related to identifying buildings or areas within Aberdeen to accommodate an existing and emerging creative sector are noted. A number of these locations are already located within the city centre where this type of development would be supported in principle or are already subject to planning application/permission, identified as an opportunity site within the extant ALDP or within intervention areas/projects contained within the CCMP. Whilst the planning system can provide a supportive policy framework, it cannot require private building owners to utilise their space for said purposes. Comments relating to funding are noted but are outwith the remit of a land use planning document.

#### **Question 15 – Percent for Art**

3, 5, 18, 20, 22, 138, 271, 291, 318, 361, 366, 367, 368, 384, 390, 445, 451, 456, 469, 471, 488, 544, 549, 554, 560, 562, 563, 565, 574, 591, 599, 610, 613: Comments on percent for art are noted. The responses suggest a level of uncertainty with regards to the remit and parameters of a policy for percent for art. This relates to what type of developments (commercial, residential, change of use etc) would be expected to contribute, where development would be expected to contribute (city centre only or all of city), whether this is a developer obligation, and what mechanism would be used to secure payment. With regards to comments about securing payments, if this approach was to be pursued, there are a number of options available which include the Local Government (Scotland) Act 1973 s69) which provides a mechanism for one off, upfront payments to be made. Agreements utilising this legislation can prove useful when the nature of contributions is straightforward and does not need to be secured through successors in Title. Such agreements can speed up the development process.

The response received to the main issues report question and draft policy indicates the focus should relate to placemaking, design and public realm rather than limited to public art in the city centre. Where possible public realm improvements, as part of the overall design of a development proposal should be addressed directly on site through site layout and design and not seen as an additional burden to development, but rather good placemaking and design. Placemaking is underpinned by a design led process and is not restricted to influencing only the appearance of a building or street but rather an overarching holistic approach to consider context and place. The aim is for new development to contribute towards the creation of successful places, based upon balancing the relationship between physical, social and economic characteristics of the area. Encouraging good design in context of its site location encourages ownership and stewardship.

It is proposed to include as part of contributions to the public realm, including open space and urban realm. This will particularly relate to proposals with a visible and/or high public profile.

### **Main Issue 3 – Support for Visitor Attraction**

3, 5, 22, 37, 284, 318, 361, 366, 445, 451, 456, 552, 560, 563, 574, 599, 613: Support for a policy to protect and grow visitor attractions is noted.

291: Disagreement for a policy to protect and grow visitor attractions is noted.

271, 441, 542: Support for option 1 is noted.

18, 22, 361, 366, 367, 368, 445, 451, 456, 469, 471, 472, 549, 552, 554, 560, 562, 563, 599, 613: Support for option 2 is noted.

3, 5, 18, 20, 22, 37, 138, 271, 284, 291, 318, 361, 366, 367, 368, 390, 441, 445, 451, 456, 469, 478, 542, 549, 552, 554, 560, 562, 563, 574, 599, 613, 619, 627: To reiterate the CCMP, Aberdeen is well served with ‘things to do’ including the renovated Art Gallery, recently refurbished Music Hall, Maritime Museum, Tollbooth Museum, Science Centre (undergoing redevelopment), Art Centre and two theatres and an evolving programme of events. Given the relative geographical isolation of Aberdeen City and the population, significantly increasing visitor numbers may be challenging. However, what can be done is investment in existing cultural attractions and in summer 2019 work commenced on redeveloping Provost Skene’s House as a new visitor attraction with works due to be complete by autumn 2020. There is, of course, opportunity for projects which are not local authority led to come forward and an example of this being Greyhope Bay Project – a heritage and science centre which has received permission to be built at the Torry Battery site. Furthermore, we aim to increase visitor numbers through a range of other interventions in the city centre to increase footfall (by increasing the number of people living in the city centre, re-balance the uses in the city centre, refocus the retail core and public realm improvements to attract visitors for example.) The city centre and retail core are the preferred locations for all retail, office, hotel, commercial leisure, community, cultural and other significant footfall generating developments and this approach will continue in the emerging ALDP. Current policy provision already supports the principle of these uses within the city centre and will continue to do so in the emerging ALDP. In light of recent approval of

“Culture Aberdeen” strategy (which lists 5 key ambitions for Aberdeen over a 10 year period), investment to the Art Gallery, Music Hall, Satrosphere and Provost Skene’s House, and continued support for the intervention areas within the CCMP we intend to expand the City Centre section of the emerging ALDP with regards to tourism and culture.

### **Policy Comments**

318: Local development plans are forward looking and already cover a 10-15 year vision period.

20, 451: The city centre should remain the focus for all significant footfall generating development. We do recognise that there may be location specific reasons for visitor attraction proposals elsewhere e.g Greyhope Bay. Where located outwith the city centre proposals for visitor attractions will be assessed on their own merits in accordance with the Development Plan as and when they come forward.

20, 471: There are other policies in the ALDP which relate specifically to the historic environment. For Aberdeen to remain a flourishing city we must ensure it is attractive, innovative and welcoming. Existing policy provision is based on design and placemaking principles and this will be carried forward to the emerging ALDP. Complementing the historic environment with modern, contemporary buildings, techniques and materials can achieve this, while also enhancing the existing.

552: We recognise that there are both challenges and opportunities in the city centre, and in line with the CCMP we aim to increase visitor numbers through a range of interventions in the city centre as detailed above. Significant investment has been made and continues to be made in visitor attractions within the city. Regarding specific quality grading of hotels – the level of detail is not suitable for inclusion within the ALDP. The city centre and retail core are the preferred locations for all retail, office, hotel, commercial leisure, community, cultural and other significant footfall generating developments and this approach will continue in the emerging ALDP. Given the proportionally small city centre, and indeed city, it is not considered necessary to have exclusion zones for visitor attractions when the town centre first and sequential approach can be applied – notwithstanding that there may be site specific locational requirements for some visitor attractions e.g Greyhope Bay.

563: Pricing of visitor attractions is outwith the remit of the ALDP. Building Standards is the appropriate legislation to deal with accessibility.

### **Other Comments**

5: Aberdeen City Council are supportive of cultural and creative strategies and work alongside a variety of partners to bring programme of events forward such as Nuart, Spectra, Look Again, Jazz Festival, North East Open Studios and Tech Fest. Significant investment has been made, and continues to be made, in visitor attractions within the city. Aberdeen City Council in partnership with Historic Environment Scotland (HES), Aberdeen City Heritage Trust and Aberdeen Inspired, has established the Union Street Conservation Area Regeneration Scheme which aims to encourage the repair and enhancement of the physical fabric of properties within a defined area of Union Street Conservation Area. This is

a five year initiative aimed at the regeneration of Union street to tackle the problems of run down historic buildings and streetscape. Previous initiatives included the Green Townscape Heritage Initiative (THI) which aimed to restore the Green and surrounding areas over a five year period and included priority projects such as The Tivoli. There are other policies in the ALDP which relate specifically to the historic environment. For Aberdeen to remain a flourishing city we must ensure it is attractive, innovative and welcoming. Existing policy provision is based on design and placemaking principles and this will be carried forward to the emerging ALDP. Complementing the historic environment with modern, contemporary buildings, techniques and materials can achieve this, while also enhancing the existing. The development at Marischal Square was granted planning permission by the planning authority, Aberdeen City Council in 2014 and took account of representations received from the public as well as statutory consultees which included Historic Scotland. Historic Scotland concluded that the proposed development would not have any significant adverse impact on the setting of Provost Skene's House or Marischal College and did not object to the planning application. Aberdeen Treasure Hub is a purpose built facility which stores many of Aberdeen's art and history collections and is temporarily housing items from the Art Gallery due to its refurbishment programme. The Hub is open for group visits and public tours by appointment and participated in Doors Open Day in September 2019.

20, 138, 291, 390, 445, 619: Comments related to new visitor and cultural attractions, sustainable tourism, preservation of granite heritage are noted, and responses given above.

138, 390, 451: Tourist signage, provision of open top bus tours, funding, advertising and ongoing development of the harbour are noted, but are issues outwith the remit of the ALDP.

390: The extant ALDP already has a Beach and Leisure zoning and will be carried forward to the Proposed ALDP.

627: Comments related to the Anthropological Museum located within Marischal College are noted, however this is outwith the ownership of Aberdeen City Council.

### **New Policy**

Current policy provision relating to existing community sites and facilities already supports the protection of existing community uses and will continue to do so in the emerging ALDP without the need for an additional policy. Consideration will be given to inserting additional text to policy provision with regards to cultural and visitor attractions.

### **Planning authority action/recommendation for Proposed Plan**

Introduce new policies on Tourism and Culture and City Centre Living.

<b>Issue 10</b>	<b>Quality Places (Space Standards)</b>
<b>Section of the MIR to which the issue relates:</b>	Main Issues Report Q16 External Space Standards Main Issue 4: Minimum Internal Space Standards for New Residential Development
<b>Planning authority's summary of the comment(s):</b>	
<b>Main Issues Report Q16 External Space Standards</b>	
<u>General Support</u>	
3, 18, 20, 22, 37, 451, 469, 544, 560, 543: Agree with approach. Strive for better amenity through standards and refuse planning permission to those which do not meet the standard.	
477: Support the approach in principle and would likely comply.	
366: Character of the City is being weakened with poor design.	
<u>Existing Amenity Space</u>	
61: Lack of amenity space in new builds.	
20, 366, 560: Current amenity space is not a sufficient quality.	
366: The space between dwellings is not sufficient, too tight.	
563: Quality needs to improve – should be considered early in design process.	
<u>Communal Space / Public Open Space</u>	
18: Existing spaces are often unimaginative and offer little to enhance quality of life or the natural environment.	
18: There also needs to be an enforceable plan for ongoing maintenance of such space.	
574: Developers should ensure funding provision for maintenance and public access allowed. Supports legal provisions for ongoing maintenance.	
20: There is no funding to improve amenity areas.	
138, 544: Research shows proximity of quality green spaces is linked with improvement of health and wellbeing.	
138: Respondent recommends masterplans should include at least 40% green spaces. Respondent notes that some green spaces in the city are over-managed and provide little biodiversity interest. Where possible, these should include wild areas.	



138/574: Elsick and Countesswells and Friarsfield have provided good quality amenity areas. New development should be to a similar standard.

271: Supports high quality amenity space that is functional rather than just grass and shrubs

361: It would be difficult to create more open space in the city - so maintain existing amenity spaces to a high standard.

543: Amenity spaces vary and more deprived areas usually have lower quality amenity areas. Quality external space should be concerned with the amount of open space and quality of the space. Respondent notes trees contribution to the quality of open spaces. Respondent urges developers to ensure what they build provides a good quality of life. Requests trees be specified as part of new developments and notes practical guidance.

#### Standard Expected - Equality

20: Standards need to be applied equally to all (big developers to private house owners).

469: Standards should be equal across all developments.

472: Amenity spaces should be included in all new developments and be of certain quality

599: Balance between providing pleasant places and cost. All significant new developments should provide good amenity space, and make provision for future maintenance

469: Standards should include internal and outdoor space, access to allotments & roof top gardens.

456: Every developer should be required to include a contemporary version of good quality amenity space & places (perhaps a building) in every development proposal. Survey other cities for ideas

#### Criteria

22: Set requirements for green, enclosed, safe, child friendly space, and adult space

61: Create greenspace or suitable play areas for children not parking spaces.

99: Cars and parking affect the quality and quantity of external amenity space. Promote spaces and places that facilitate walking and cycling.

367: Standards for space for clothes drying, planting and food growing to encourage sustainability

368: More space between buildings for privacy and natural light. More open spaces for children. Landscaping for biodiversity. Minimise hard surfaces for absorption of rainwater.

451: It should incorporate the existing restrictions on building within the curtilage of an existing property (ref. SG: The Sub-Division and Redevelopment of Residential Curtilages).

554: More attractive frontages, planting and green space.

390, 549: The highest standard of external amenity space should be a requirement.

477: Some customers do not want a garden. The standards should not restrict consumer choice.

540: Excessively strict standards lead to more and more developments seeking to achieve the bare minimum, in order to (as an average) be a viable solution

### Concerns

445: Extremely difficult to apply this due to the number of variables.

471: It is wrong to set a policy that makes all development provide a set level of amenity space. It needs to be context driven. Developers should carry out an analysis of all open space in the vicinity and only after this is done, should a level of open space be decided on for provision.

477: Poor-quality development in urban design terms – for example without well designed public open space – could successfully meet new standards but produce development which is much poorer and does not give the same overall offering. This must be considered by the city council in the formulation and application of any future standards.

477: New standards to be sufficiently flexible to appeal to different customers.

488: Flexibility is valued in this respect. A more rigid approach through new policy will not be beneficial.

540: Inappropriate to dictate what people might wish to buy or rent. Flexibility and a degree of choice is needed, and an understanding of what is marketable. Approach could lead to further standardised housing and the development of lifeless developments.

591: Rigid standards will be unworkable in certain situations and will lead to conflict with other policies. Do not support approach.

610: New standards would not be welcomed. A flexible approach needs to be retained for individual proposals. A rigid list of standards would not achieve this.

565: Queries if the issue is a result of demands, as developers currently deliver what market demands. Flexibility should be permitted to suit the market. Quantity should be relevant to proposed development – not always a need for large areas of open space. Suggests inclusion of balcony and terrace space in the standard as other Local Authorities do. Respondent does not object to the suggested but requests a degree of flexibility in the

context of the proposals. Supports early consideration in the design process. Suggests amenity space be considered under design policy.

#### Existing Mechanism

477: The City Council should better utilise the mechanisms already at their disposal in their LDP, including Policy D1 - Quality Placemaking by Design and their supplementary guidance, so that poor quality development is not permitted.

488: New development should continue to be delivered on a design-led basis without the introduction of overly prescriptive policies which may serve to homogenise the creation of place. Support the placemaking agenda in planning applications by providing amenity space, open space, external finishings and garden space which is of a quality and quantity acceptable to both the applicant and the Council.

591: Current approach ensures appropriate levels are achieved through a design led approach which is context driven, flexible and innovative.

610: Existing policies are adequate for external space standards.

540: Respondent submits that the current policy position is arguably too strict, and that further flexibility should be afforded to the developers and the designers to create places that people want to live in.

#### Developing the standards

477: Would expect sufficient time and resource to be allocated to the development of standards, with a drafting and consultation process involving developers, including those responsible for the delivery of long-term urban extensions – where the next phases of development will be influenced by the application of standards.

#### Miscellaneous

284: No new developments

551: Developers, communities and homeowners should maintain connectivity between green spaces for a network of habitats. Wildlife landscaping should not be restricted to peripheral green spaces. Green infrastructure should be front loaded in new developments and accessible as a community resource.

551: Attaches excerpt from “Designing for Biodiversity: a technical guide for new and existing buildings” (RIBA Publishing, 2013) and “Basic principles for biodiversity enhancing landscape design in developments Biodiversity for urban landscapes” (Bat Conservation Trust).

## Placemaking

469: Other housing / design / placemaking requirements. Houses should be built to high energy efficiency standards with renewable energy as standard. All homes should have access to good public transport, walking and cycling links.

## **Main Issue 4: Minimum Internal Space Standards for New Residential Development**

### General Points

3: Police planning permissions and building warrants more rigorously, be harder on developers.

5: Apply Parker-Morris Standards

138, 627: Supports the principle of minimum standards.

291, 456: Develop and implement a policy.

565: Queries if the issue is a result of demands, as developers currently deliver what market demands. Respondent presently delivers high quality developments in excess of UK space standards. Flexibility should be permitted to suit the market.

### Option 1: Current Approach

473, 488, 540, 542, 591, 610: Support current approach, do not support proposed approach. Market will determine. Setting a minimum standard will not make housing more affordable. Standards could sterilise development, lead to viability and affordability issues.

540: Planning policies are sufficiently robust to ensure that housing is suitable in terms of light, privacy, private and public open space and general amenity.

488, 591, 610: Current approach is a flexible, design led approach which is context driven, creates a varied and interesting range of new housing. Evidence used is based on historic analysis on an English setting. Concern is raised at the lack of credible, up-to-date and Scottish based evidence. Building standards regulate floorspace.

488: Savills research from 2015 refutes the house sizes data.

610: Present a significant change to existing practice. This is another layer of complexity which would be unnecessary and counterproductive.

451: The current approach is not supported.

### Option 2: Preferred Approach

22, 138, 367, 456, 472, 544, 549, 560, 562, 563, 599: Support preferred approach

544: Quality of housing is an important determinant of health. Would proactively address living space which is an important component of housing quality.

549: Should improve the quality of residential developments.

574: It falls in line with a nationally described space standard so likely to be preferable to developers.

599: A humane way to proceed but risk involved. Less well off could be priced out of the market as developers may charge more.

### Option 3: Alternative Approach

271, 284, 318, 361, 366, 368, 445, 451, 469, 471, 477, 554, 574: Support alternative approach.

477: Support in principle and would likely comply.

318: Understand the needs of the people. Supports a tailored approach for case by case

361: Would raise the standard of new residential development, encouraging more investment in the City

366: There should be a requirement that external space isn't sacrificed for internal space.

445: Building regulations must be revised to achieve comfortable and acceptable living standards, with a sustained monitoring programme of what is being built.

451: A positive move. The same space requirements should be reflected in HMO applications.

469: Do not including flexibility for city centre conversions. City centre living should provide quality housing rather than substandard.

471: There should be a desire to achieve a range within each development. This should be between 150m<sup>2</sup> and 40m<sup>2</sup> per dwelling. If a minimum is set, all development will just comply with the minimum and there will be no range.

### Miscellaneous

284: No new developments

### Developing the standards

477: Would expect sufficient time and resource to be allocated to the development of those standards, with a drafting and consultation process involving developers, including those responsible for the delivery of long-term urban extensions – the next phases of which will be influenced by their application. New standards to be sufficiently flexible to allow for variety in

product, house type and different tenures in response to changing or more varied demands from purchasers.

### Placemaking

619: Heritage/ Granite - Supports re-use of granite in construction materials. Needs to be an effort to preserve rather than demolish granite buildings and cobbled streets – which are Aberdeen’s distinctive character.

619: Big Buildings - Consideration should be given to avoid overshadowing and overcrowding – need to compliment iconic landmarks and lines of sight and light.

627: Amenity - Respondent notes that impact on existing amenity of neighbouring and nearby residential properties and existing amenity of the area in general should be noted at every stage of proposed development.

627: Respondent raises new policy to protect residential character of Old Aberdeen High Street and College Bounds.

### **Summary of response by planning authority:**

#### **Main Issues Report Q16 External Space Standards**

##### General Support

3, 18, 20, 22, 37, 451, 469, 477, 544, 560, 543: Support for the approach is noted.

366: Comments on the character of the city and poor design are noted. The existing design policies are based on placemaking principles. For Aberdeen to remain as a flourishing city we must ensure it is attractive, innovative and welcoming. Complementing the historic environment with modern, contemporary buildings, techniques and materials can achieve this, while also enhancing the existing.

##### Existing Amenity Space

20, 61, 366, 560: Comments regarding the lack of and insufficient quality of current amenity space, and separation space between buildings are noted.

563: Comments relating to increasing quality and early engagement in the design process are noted.

##### Communal Space / Public Open Space

18, 20, 138, 544: Comments on open space, quality of life, the natural environment and the link between quality amenity / green space and health and wellbeing are noted.

18, 574: The planning system has little control over open space maintenance. It can make provision for maintenance through planning conditions or agreements. Maintenance of public

open space can be achieved via the Council adopting open space if certain criteria are met, the establishment of Residents' Associations or Third Party Arrangements.

20: Funding is not applicable to the Proposed ALDP.

138/574: In terms of greenspace provision the reference to Elswick, Countesswells and Friasfied as examples of good practice are noted.

138: Existing policy requires a provision of green/ open space based on number of people rather than a percentage of the site. The biodiversity interest of open space and 'wild' areas are noted. Further discussion on natural environment can be found under issue 11.

271: Current policy on open space includes functional areas such as play parks, allotments, sports pitches / playing fields etc along with more naturalised spaces. There is also an increased interest in food growing. The Main Issues Report was used to investigate the appetite for food growing. These are further discussed under issue 11.

361: Existing policy notes open space provision is required in new development. Maintenance of public open space can be achieved via the Council adopting open space if certain criteria are met, the establishment of Residents' Associations or Third Party Arrangements. Public open spaces have a variety of uses and requirements, including protecting and maintaining wildlife habitat and biodiversity.

543: Aberdeen City Council carry out open space audits to assess open space location, biodiversity impact, quality and a number of other factors. This audit is used when considering Section 75 agreements for developments on the local area. At present trees are expected on new development site as per policy. These are further discussed under issue 11.

#### Standard Expected - Equality

20, 469: Standards will be applied equally.

472, 599: Current policy requires open space be provided in new developments. The quality of the open space provided is questioned in the Main Issues Report.

469, 456: Reference to types of amenity space are noted. Allotments are planned into many of the existing masterplanned sites, and there is support for green roofs and green walls in new or existing sites and buildings. These elements will also assist climate change mitigation and increasing biodiversity.

#### Criteria

22, 61, 99, 369, 368, 390, 451, 549, 554: The list of criteria or expected uses for open space are welcome and noted. The impact of competing land uses within a development (open space and car parking) are noted.

477: Examples of open space are given in the Main Issues Report, these include balconies, terraces and communal garden more typically found in medium to high density locations, as well as private rear gardens which are more typically found in a suburban context. Provision of a balcony, terrace or communal area may be more suitable depending on the location and type of development.

540: It is anticipated the standards would to be context specific and would give guidance on what is expected.

### Concerns

445: External space standards are present in a number of local developments plans in Scotland. The extant ALDP requires open space be provided in new developments. It is anticipated standards could provide additional clarity on what is required and expected.

471: It is anticipated the standards would to be context specific and take cognisance of the open space audit.

477: It is not anticipated the provision of private space will negate the provision of public space, furthermore development will still have to be designed according to placemaking principles.

477, 488, 540, 591, 565, 610: Comments relating to flexibility are noted. It is anticipated the standards would to be context specific. Developments would be required to be designed in accordance with placemaking principles.

565: It is anticipated balconies and terraces would be included; these are outlined within the Main Issues Report as examples of private open space and are referenced within the current supplementary guidance on landscape.

### Existing Mechanism

477, 488, 591, 610: The comments relating to the current design led placemaking policy approach and supplementary guidance are noted. It is anticipated the minimum standards and placemaking policies would work together, one relating to meeting the six qualities of successful place, the other providing standards contributing to creating places that respect and enhance the character of the City. The current policy approach is based on design led placemaking and minimum garden lengths to ensure privacy between dwellings.

540: The comment stating the current approach is too restrictive is noted. We would welcome creative design and innovative placemaking proposals. However, our experience suggests that we need to continue to set out our detailed policy requirements.

### Developing the standards

477: Further consideration needs to be given on external space standards based on the results of the Main Issues Report consultation, determining if policy or guidance is required.



The current policy approach is based on design led placemaking and minimum garden lengths to ensure privacy between dwellings.

#### Miscellaneous

284: The SDP sets the housing and employment land allocations for Aberdeen City. We are legally obliged to meet these targets.

551: Aberdeen has a well-established greenspace network and the extant ALDP has a policy in place to protect and enhance its greenspace network. Further to this, there are policies on urban greenspace and the green belt. New developments are required to take cognisance of the greenspace network and identify new areas incorporating greenspace network.

551: The two excerpts, “Designing for Biodiversity: a technical guide for new and existing buildings” (RIBA Publishing, 2013) and “Basic principles for biodiversity enhancing landscape design in developments Biodiversity for urban landscapes” (Bat Conservation Trust) are noted. The extant ALDP has a policy in place to protect and enhance its greenspace network. Biodiversity is also discussed under issue 11.

#### Placemaking

469: There are other policies within the Proposed ALDP which relate to energy efficiency, active travel and public transport.

### **Main Issue 4: Minimum Internal Space Standards for New Residential Development**

#### General Points

3: Police planning permissions and building warrants more rigorously, be harder on developers.

5: Apply Parker-Morris Standards

138, 627: Supports the principle of minimum standards.

291, 456: Develop and implement a policy.

565: Queries if the issue is a result of demands, as developers currently deliver what market demands. Respondent presently delivers high quality developments in excess of UK space standards. Flexibility should be permitted to suit the market.

#### Option 1: Current Approach

473, 488, 540, 542, 591, 610: Support for the existing approach is noted. Comments relating to affordability of housing, sterilising development and impact on viability are noted. Other local authorities within Scotland (Dundee and Edinburgh) have policy / guidance on internal space standards; there are further examples within the United Kingdom.

540: The robustness of the existing policies in terms of light, privacy, public and private open space and general amenity are welcomed and noted.

488, 591, 610: Comments relating to the flexibility of the existing design led, context driven approach are noted. The concern relating to the evidence base in terms of its historic nature and location parameters are noted. The relationship of space standards to Building Standards are noted.

488: The reference to Savills 2015 research paper is welcomed.

610: The approach would be a change to the existing practice. Space standards are present within other local authority's local development plans and technical guidance, the space standards were deemed to provide further guidance to enable distinctiveness to new housing development.

451: The comment not supporting the current approach is noted.

#### Option 2: Preferred Approach

22, 138, 367, 456, 472, 544, 549, 560, 562, 563, 599: Support for the preferred approach is noted.

544, 549, 574: The comments relating to housing and health, improving quality, relationship to nationally prescribed standards, are noted.

599: The suggestion affordability will be impacted by space standards is noted.

#### Option 3: Alternative Approach

271, 284, 318, 361, 366, 368, 445, 451, 469, 471, 477, 554, 574: Support for the alternative approach is noted.

318, 361: Comments noting understanding need, raising standard of residential development and encouraging investment are noted.

366: The relationship between ensuring there is satisfactory outdoor space along with internal space is noted.

445: Building Standards are subject to a separate legislative process. It is anticipated space standards would not create a conflict with Buildings Standards legislation.

451: Houses of Multiple Occupation fall within a different use class order to residential. They are also subject to standards, B36112 guide for landlords which specifies room sizes.

469: All development has to adhere to placemaking principles. Many of the buildings within the city centre are located within conservation areas or are listed buildings. Conversions of city centre buildings will have to pay due consideration to the existing built form. There may have to be flexibility to enable continued use of an existing building. A mix of unit types and

sizes would be supported, to ensure there is variety of living accommodation. The creation of substandard developments would be the antitheses of the proposed approach.

471: It is agreed a range of different living arrangements is required to produce a successful development. Current policy requires developments of over 50 units to provide a mix of housing and be designed with placemaking principles. The addition of space standards will not remove these elements. The proposed standards are minimums, it is anticipated developments will also be based on an assessment of context.

#### Miscellaneous

284: The SDP sets the housing and employment land allocations for Aberdeen City. We are legally obliged to meet these targets.

#### Developing the standards

477: Consultation with development industry is welcome. Further consideration needs to be given on internal space standards based on the results of the Main Issues Report consultation, determining if policy or guidance is required, and if so the best way to present the information.

#### Placemaking

619: There are existing policies on place to protect Aberdeen built heritage. The demolition of listed buildings, or building in conservation areas have to meet strict criteria, and are not a common occurrence. Granite buildings are located across a significant area of Aberdeen. The support of the reuse of granite policy is noted.

619: The existing policy and supplementary guidance on Big Buildings which will be taken forward into the Proposed ALDP and associated Aberdeen Planning Guidance (APG) discuss overshadowing, context analysis, visual analysis amongst other criteria. Big buildings also have to satisfy the placemaking principles.

627: Amenity forms part of successful placemaking, and within the current ALDP consideration has to be given to the impact of development on adjoining uses. (six qualities of successful placemaking – Safe and Pleasant), further to this the recent letter from the Chief Planner discusses the agent of change principle regarding music venues. Consider if the current wording of the six criteria reflects this.

627: The University has been an integral part of Old Aberdeen for centuries and the character of the area and many of its unique and historical buildings owe much to the University's presence. This area of Old Aberdeen is zoned as CF1: Existing Community Sites and Facilities to reflect the use and ownership of many these properties and what the Council deem as appropriate in terms of future development. The zoning of Old Aberdeen is historical and will remain as CF1 with the policy wording remaining unchanged. We think that the last paragraph of Policy CF1 provides protection to the character and vitality of existing communities within the area.

## Planning authority action/recommendation for Proposed Plan

### External Space Standards

Investigate supplementary guidance and consider if existing policy needs to be highlighted or brought into the Proposed ALDP, and ensure this is fit for purpose.

Assess the viability of developing criteria for space standards.

If a policy is deemed to be the best way forward, ensure there are clear linkages between the open space policy and the open space standards.

Consider the “Designing for Biodiversity: a technical guide for new and existing buildings” (RIBA Publishing, 2013) and “Basic principles for biodiversity enhancing landscape design in developments Biodiversity for urban landscapes” (Bat Conservation Trust) with regard to open space.

### Main Issue 4: Minimum Internal Space Standards for New Residential Development

Assess the viability of developing criteria for space standards taking account of the comments and research papers submitted above, and the approaches used by other local authorities.

<b>Issue 11</b>	<b>Natural Environment</b>
<b>Section of the MIR to which the issue relates:</b>	Section 4.4 Natural Environment and Section 5.5 Food Growing
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Issue 11 Natural Environment</b>  <b>Question 17 Natural Environment</b></p> <p><b>Policy Re-structure (support)</b></p> <p>001, 018, 022, 291, 361, 361, 366, 367, 368, 441, 456, 469, 544, 549, 560, 565, 574, 579, 598, 610, 633: Agree</p> <p><b>Policy Re-structure (does not support)</b></p> <p>486, 554: Current approach is clearer</p> <p>005: Disagrees with proposed structure (role of Green Belt should be clarified)</p> <p>271: Disagrees with proposed structure (concerns that policies will be devalued – does not agree with pairing of NE5 and NE8).</p> <p>543: Concerns that Trees &amp; Woodland policy will be devalued under the proposed structure. Recommends Forestry Strategy should be jointly prepared with Aberdeenshire Council.</p> <p><b>Policy Re-structure (general)</b></p> <p>422, 488, 528, 579, 598: Respondents wish to see wording of policies in order to comment.</p> <p><b>General Comments</b></p> <p>037: Natural environment is a priority for quality of life</p> <p>109: Clarity sought on whether National Marine Plan was consulted in the preparation of the Main Issues Report.</p> <p>318: Policies need to be regarded as guidelines – Council's responsibility and not developer's burden.</p> <p>445: Notes erosion of green space and green corridors.</p> <p>451: Natural Heritage is a priority. Agrees with the Main Issues Report in relation to 'connectivity'. Suggests a policy to encourage 'rewilding' unused sites for biodiversity.</p>	

549: Dislikes use of word 'infrastructure' for describing green spaces.

563: No greenfield development in the Green Belt

619: Supports protection and enhancement of green spaces for sport and leisure. These should be fully accessible to communities. Suggests prioritisation of 'sensory spaces' for the benefit of those with physical or mental health conditions.

625: Reference to be made in next Plan to Scottish Government's Control of Woodland Removal policy. Requests a general presumption against development in woodland unless there are no alternatives. Requests a green corridor overlaid on the Plan to ensure connectivity of species and active travel routes. Would like to encourage woodland creation within the city boundary and notes grants are available for this – Forestry Grant Scheme

633: Notes the possible status of Supplementary Guidance moving forward, particularly with reference to existing Policy NE6. Requests a presumption against development within floodplains in Proposed ALDP.

422: Notes relevant priorities for next Plan regarding green space/ green network and associated benefits.

488: Does not support enlargement of Green Belt. Supports policies that protect the environment but there is also a need to consider the benefits of new homes (e.g. increased economic growth and national priorities)

619: Welcomes commitment to EU Water Framework Directive. After Brexit, environmental issues should remain at high standards as they do now.

138: Supports creation of new natural environments. Encourages different approaches to Sustainable Urban Drainage Systems (SUDS). Observations given on creation of areas with valuable biodiversity, meaningful environmental assessments and quality urban green spaces.

### **Current Trees & Woodlands Policy**

226, 227, 230, 231, 232, 233, 234, 235, 236, 237, 287, 426, 427, 428, 429, 430, 431, 432, 433, 434, 446, 528, 565, 579, 591, 598, 610: Does not support existing policy; it is not fit-for-purpose and is unduly restrictive. Reference to inconsistency with BS Guidance BS 5837 2012 regarding Zone of Influence guidance.

### **Current Natural Heritage Policy**

591, 598, 610: Notes that Policy NE4 is less flexible compared to other policies as it has a standardised approach.

505: Policy NE3 Food Growing should be included in Urban Green Spaces. Policy NE4 should include Food Growing spaces as part of new development.

551: Welcomes the strengthening of Policy NE8 point 4.

### **Other**

284: Comments on Council garden waste charges

### **Question 18 Food-Growing Food-Growing Projects**

003, 550: Supports Gwen's Garden

318: Supports proposed Blaircara Village bid.

### **Location of Food-Growing**

018: Vacant spaces at the rear of residential buildings. Greater education on food growing and cookery is important.

022, 361: Better use and maintenance of existing allotments and similar facilities.

445: Encourages use of private garden spaces. Allotments or communal spaces should be planned into development.

574: More land for allotments (suggests Milltimber Primary School)

### **Food-Growing – support**

138: Supports concept and acknowledges potential benefits (environmental). Encourages imaginative solutions.

422, 551: Supports actions that deliver food growing and acknowledges potential benefits (environmental, psychological, physical) Reference to government and key agency guidance.

560: Generally supportive but recognises practical challenges in access and maintenance of such spaces.

544, 620: Notes public health benefits of food growing. Recommends link between Local Development Plan and Local Outcome Improvement Plan which is supported by sustainable cities food programme.

### **Food-Growing – does not support**

291, 563: No need to grow food in the City/ not important

### **Food-Growing – general**

366: More space for allotments to support community producers. Could be beneficial in areas of deprivation.

367: LDP could support community work.

469: Access to green spaces (allotments, green roofs) should be encouraged

565: Requests further information on this topic. Food Growing infrastructure should not be included as a further requirement of developers.

451: Allotments can be targeted for antisocial behaviour – Council could install CCTV.

472: Ensure green spaces are not given over to developers

### **Food-Growing Policy**

367, 469, 472, 505, 540, 551, 574: Supportive of a new policy in the next Plan

505: Encourages protection of existing Food Growing spaces. Council should identify more land for community growing and align Plan with the Council's Food Growing Strategy.

540: A blanket policy may not work and could hinder development – the Officer should be allowed flexibility to apply a policy to the individual site and proposal.

456: New development proposals should have a food growing requirement – include within amenity policy. Supports allotments and greenhouses.

562: Plan could identify food growing sites. A policy could increase interest in food growing.

599: Larger schemes should set aside land for food growing. City Centre sites may be expensive, and condition of land may make it unviable for growing.

620: Makes recommendation of how Food Growing can be included in the next Local Development Plan through existing or new policy, identifying land/ sites, use of Developer Obligations and use of temporary sites.

### **Summary of response by planning authority:**

#### **Issue 11 Natural Environment**

#### **Question 17 Natural Environment**

#### **Policy Re-structure (support)**

001, 018, 022, 291, 361, 361, 366, 367, 368, 441, 456, 469, 544, 549, 560, 565, 574, 579, 598, 610, 633: Respondents agree with the proposed change to the Natural Environment (NE) policy structure. We welcome the responses in support of the policy re-structure. We propose that the content and principles of the policies within the extant ALDP will be carried forward, with some small updates and a simpler framework as shown in the diagram within the Main Issues Report (2019) (page 39). Since the Main Issues Report consultation, the Trees and Woodlands topic has been separated into its own policy (Policy NE5 Trees and Woodland) with updated content.



### **Policy Re-structure (does not support)**

486, 554: Respondents disagree with the proposed change to the Natural Environment (NE) policy structure and prefer the existing approach. This is noted.

005: Respondent disagrees with the proposed change to the Natural Environment (NE) policy structure, as there needs to be greater clarity about the role of the Green Belt. The principle of our Natural Environment policies will be retained into the Proposed ALDP; the content of the policies may be subject to minor amendments. The role of the Green Belt and our position on development in the Green Belt is largely unchanged from the extant ALDP. It remains a vital mechanism to maintain the distinct identity of Aberdeen, maintain Aberdeen's landscape setting, and provide access to open space.

271: Respondent disagrees with the proposed change to the Natural Environment (NE) policy structure and has concerns that the content of the policies will be devalued. The Respondent does not agree with the grouping of current Policy NE5 (Trees and Woodland) and NE8 (Natural Heritage). The principle of our Natural Environment policies will be retained into the Proposed ALDP; the content of the policies may be subject to minor amendments. The amalgamation of policies will not devalue their statutory weight. Notwithstanding, it has been agreed that Trees and Woodland will now form its own standalone policy from NE3 (NE5 Trees and Woodland). The text within the policy and relevant Supplementary Guidance (to be replaced by Aberdeen Planning Guidance) will also support the policy as proposed.

543: Respondent disagrees with the proposed change to the Natural Environment (NE) policy structure and has concerns that the content of the policies will be devalued. The principle of our Natural Environment policies will be retained into the Proposed ALDP; the content of the policies may be subject to minor amendments. The amalgamation of policies will not devalue their statutory weight. However, noting comments through this consultation, it has been decided that Trees and Woodland will now be featured as a standalone policy from NE3 (NE5 Trees and Woodland).

The Forestry Strategy is introduced as a requirement in the Planning (Scotland) Act 2019, under Section 53. The Planning Authority is to prepare a Forestry and Woodland Strategy. At the time of writing this part of the Act is not enacted, however we will work closely with our internal services to ensure statutory duties are fulfilled. It is unknown at this stage whether this will be prepared jointly with Aberdeenshire Council, however there is provision for this within the Act (Section 53 (5)) but we note the suggestion by the respondent.

### **Policy Re-structure (general)**

422, 488, 528, 579, 598: Respondents note that they would prefer to see suggested policy wording of the amalgamated policies. The principle of our Natural Environment policies will be retained into the Proposed ALDP; the content of the policies may be subject to minor amendments. Further guidance in the form of Supplementary Guidance or other advice notes will be utilised wherever necessary to support the policies in the ALDP.

### **General Comments**

472, 599: Respondents have no view on the proposed structure.

037: Respondent makes a general comment regarding the value of the Natural Environment. The principles of our Natural Environment policies will be retained into the Proposed ALDP.

109: Several policies, strategies and guidance were consulted in the review of the Local Development Plan and in preparation of the Main Issues Report. Scotland's National Marine Plan was considered; environmental guidance within the Proposed ALDP will be retained as required, however our current policy position which presents a presumption in protecting the natural environment is unlikely to change from the extant ALDP (2017).

318: Respondent makes comments regarding the weight of policies in the context of proposed development. Respondent deems this to be a Council responsibility and should not be a burden to developers. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment. The principle of our Natural Environment policies will be retained into the Proposed ALDP. The Council will work with developers to ensure conditions of planning permission sought are reasonable and justified.

445: Respondent notes the erosion of green space and corridors. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment. The principle of our Natural Environment policies will be retained into the Proposed ALDP.

451: Respondent supports that Natural Heritage and connectivity is a priority, with 'rewilding' as a possible solution to enhance biodiversity on unused sites. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment. The principle of our Natural Environment policies will be retained into the Proposed ALDP. Whilst the ALDP can anticipate the future use of some sites to a certain extent, other sites may lie unused for several reasons. The Council seeks to maintain a high-quality environment for people to live, work and visit. If there is an opportunity to enhance the environmental value of a site, then the appropriate teams within the Council would investigate this.

549: Respondent is not supportive of the term 'infrastructure' in describing natural/ green spaces. Green (and blue) infrastructure is a widely used term in spatial planning. This is defined in Scottish Planning Policy (2014) as; "Includes the 'green' and 'blue' (water environment) features of the natural and built environments that can provide benefits without being connected. Green features include parks, woodlands, trees, play spaces, allotments, community growing spaces, outdoor sports facilities, churchyards and cemeteries, swales, hedges, verges and gardens."

563: Respondent does not support development of greenfield land within the Green Belt. The principle of our Natural Environment policies will be retained into the Proposed ALDP; the content of the policies may be subject to minor amendments. The role of the Green Belt and our position on development in the Green Belt is unchanged from the extant ALDP (2017). Some greenfield land may be released for development under our 'Land Release'

policy and zoned for development in order to accommodate planned growth. Otherwise, windfall development in the Green Belt must meet our specific policy criteria; if it is found to be contrary to policy, it will likely not be supported.

619: Respondent supports the protection and enhancement of green spaces and ensuring their accessibility. The respondent suggests that we prioritise 'sensory spaces'. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment. The principle of our Natural Environment policies will be retained into the Proposed ALDP and we will continue to support the protection and enhancement of these spaces. With regards to sensory spaces, we have identified existing areas that form the Green Space Network and Urban Green Spaces (on the Proposals Map) where such spaces could be accommodated. We also set a requirement for open space in new developments and the provision of this type of space would be reviewed through the Development Management process.

625: Respondent requests reference to the Scottish Government's Control of Woodland Removal policy in the Proposed ALDP. Respondent requests a presumption against development in woodland and a green corridor overlaid in the Proposed ALDP. Respondent requests encouragement of woodland creation. The principle of our Natural Environment policies will be retained into the Proposed ALDP; the content of the policies may be subject to minor amendments. In response, at present, there is a presumption against development that results in the loss of, or damage to, trees and woodland. This Policy (and others) have been referenced in the Proposed ALDP, with links to direct readers to them. The extant ALDP also currently supports the creation of new woodland and planting of trees wherever appropriate. The Green Space Network is an existing layer that is provided on the Proposals Map that highlights species connectivity, active travel routes, etc as described by the respondent.

633: Respondent makes comments about the possible status of Supplementary Guidance in future ALDP's. Respondent requests a presumption against development within floodplains in the next Proposed ALDP. Supplementary Guidance will be known as Aberdeen Planning Guidance (APG) moving forward through our plan-making process. We will utilise all forms of statutory and non-statutory methods to ensure appropriate information is supplied alongside the Proposed ALDP. Development on floodplains is not supported in the extant ALDP as per Scottish Planning Policy, and this principle will be continued to the next.

422: Respondent sets out key priorities for strengthening green infrastructure in the Proposed ALDP. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment. The principle of our Natural Environment policies will be retained into the Proposed ALDP and we will continue to support the protection and enhancement of these spaces. We will be retaining the Green Space Network and welcome opportunities to enhance it.

488: Respondent does not support inclusion of further land for the Green Belt. Respondent supports policies that protect the Natural Environment but also encourages the benefits of housing delivery to be considered. The Natural Environment is an important topic area; the

Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment. The principle of our Natural Environment policies will be retained into the Proposed ALDP and we will continue to support the protection and enhancement of these spaces. Some greenfield land is released for development under our 'Land Release' policy and zoned for development. Typically, most other types of development in the Green Belt will be contrary to policy and will not be supported.

619: Respondent welcomes the commitment of the Council to the EU Water Framework Directive – this should remain post-Brexit. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment (including our water environment). The principle of our Natural Environment policies will be retained into the Proposed ALDP and we will continue to support the protection and enhancement of these spaces. Brexit is an unknown factor in the consideration of the Proposed ALDP. The development planning process will continue as set out in legislation, until changes dictate otherwise.

138: Respondent supports the creation of new natural environments and encourages different approaches to Sustainable Urban Drainage Systems (SuDS) and notes the potential benefits of these. We require adequate drainage solutions for development proposals under the Proposed ALDP. Solutions appropriate to the site and development context can be reviewed during the Development Management process.

### **Current Trees & Woodlands Policy**

226, 227, 230, 231, 232, 233, 234, 235, 236, 237, 287, 426, 427, 428, 429, 430, 431, 432, 433, 434, 446, 528, 565, 579, 591, 598, 610: Respondents are not supportive of current Policy NE5 (Trees & Woodland) and associated guidance. We have reviewed this guidance with our Environmental Policy and Development Management colleagues to ensure the policy and guidance remain relevant and reasonable.

In policy, Aberdeen City Council has a position that seeks to protect and enhance the natural environment. This will be carried forward to the Proposed ALDP. The wording of Policy NE5 Trees and Woodland (previously NE3 Our Natural Heritage in the Main Issues Report) has been amended to remove any dubiety from its content and ensure the expectations of the Council are clear.

The term Zone of Influence (ZOI) is not strictly referenced within BS5837:2012. This reference comes from the National House Builders Council Standards 2011, Part 4.2 Building near trees. As a familiar industry term that refers to the lateral extent of the influence of trees and one that is referenced in terms of the mature height of trees, the term ZOI appears to be an appropriate description for our purpose and builds on a concept that should be acceptable to the development industry. We could of course rename this as a 'buffer' zone or similar, if it is felt that this would be more appropriate.

Whilst the term ZOI is not referenced in BS5837:2012 the concept of establishing a safe and suitable distance between trees and infrastructure, particularly dwellings and garden ground

is still supported and recommended. BS5837:2012 section 5.2.4 is referenced as relevant; “Particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development. Where such trees are retained, adequate space should be allowed for their long-term physical retention and future maintenance”.

The Zone of Influence guidance will therefore be retained - however this guidance will be reviewed in due course to ensure it is up-to-date and relevant.

591, 598, 610: Respondents note that current Policy NE4 (Open Space Provision in New Development) is less flexible than other policies as it proposes a standardised approach. Open space requirements in new development is an important consideration, particularly when ensuring sustainable communities with access to meaningful open spaces. The open space policy is retained in the Proposed ALDP, and the existing Supplementary Guidance (which will become Aberdeen Planning Guidance) will be reviewed to ensure standards meet current needs.

505: Respondent comments on inclusion of food-growing guidance in Policy NE3 and/or NE4. Food-growing was identified in our Main Issues Report (2019) as an emerging topic area for consideration in the Proposed ALDP. We have acknowledged the rising importance of food-growing from the national level and have consulted with the Council’s food-growing working group to propose a broader inclusion of this within existing policy. Our support for food-growing spaces opportunities is set out in the Natural Environment section.

551: Note that the respondent is in support of strengthening existing Natural Heritage policy, particularly where non-designated sites should be protected and enhanced. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment (including our water environment). The principle of our Natural Environment policies will be retained into the proposed ALDP and we will continue to support the protection and enhancement of these spaces as far as possible regardless of their designation. This policy has been consulted upon with our Environmental Policy colleagues and Key Agencies; and is subject to further consultation as part of the Proposed ALDP process.

## **Other**

284: Respondent comments on Council waste collection charges. This is not an issue that the Proposed ALDP can address, however further information can be found on the Aberdeen City Council website, or by telephoning/visiting our Customer Service team.

## **Issue 11 Natural Environment Question 18 Food-Growing**

### **Food-Growing Projects**

003, 550: Respondents support the Gwen’s Garden community project in Garthdee. These comments are in relation to a proposed development bid site which was assessed as

'desirable' in the Main Issues Report (B11/01 Land at Garthdee Road). We have considered all comments relating to sites consulted upon during the Main Issues Report stage. We acknowledge the value of projects such as this and have decided to amend the recommendation for this site to undesirable for residential development.

318: Respondent writes comments in support of the Blaircara Village development bid (B09/22 Land at West Craigton), assessed as 'undesirable' in the Main Issues Report. We have collated and considered all comments relating to proposed sites. We still uphold the assessment and justification carried out for this site; therefore the site recommendation will remain unchanged.

### **Location of Food-Growing**

018: Respondents suggest possible locations to encourage food-growing opportunities in the city. Food-growing will be supported through existing policy mechanisms as a type of open space. Vacant spaces within existing residential properties would be the responsibility of the homeowner and not a matter that can be managed through the ALDP. Increasing education on food-growing and cookery is also a useful suggestion in raising the profile of food-growing however is not a matter that can be managed through the Proposed ALDP at this time.

022, 361: Respondents suggest that existing allotments could be better used and managed. The Proposed ALDP aims to broaden the scope of food-growing from the existing sole reference to 'allotments' in Policy NE3 (Urban Green Space) to incorporate different ways of delivering food-growing. This will align with the Council's forthcoming Draft Food Growing Strategy which will set out the Council's position on how to manage existing and new opportunities.

445: Respondents suggest possible locations to encourage food-growing opportunities in the city. Food-growing will be supported through existing policy mechanisms (such as Green Space Network, Urban Green Space, etc) as a type of open space. Vacant spaces within existing residential properties would be the responsibility of the homeowner and not a planning matter. Under existing Policy NE4 (Open Space Provision in New Development), the provision of allotments in new developments are supported as a type of open space. Moving into the Proposed ALDP, we will continue to support this and broaden 'food-growing' to different types of projects in addition to allotments.

574: Respondents suggest that more land is required for allotments. The Proposed ALDP aims to broaden the scope of food-growing from the existing sole reference to 'allotments' in Policy NE3 (Urban Green Space) to incorporate different ways of delivering food-growing. This will align with the Council's forthcoming Draft Food Growing Strategy which will set out the Council's position on how to manage existing and new opportunities.

### **Food-Growing – support**

138: Respondent provides general comments in support of food-growing. Moving into the proposed ALDP, we will continue our existing policy position and broaden 'food-growing' to different types of projects in addition to allotments. This will align with the Council's

forthcoming Draft Food Growing Strategy which will set out the Council's position on how to manage existing and new opportunities.

422, 551: Respondent provides general comments in support of food-growing. Moving into the Proposed ALDP, we will continue our existing policy position and broaden 'food-growing' to different types of projects in addition to allotments. This will align with the Council's forthcoming Draft Food Growing Strategy which will set out the Council's position on how to manage existing and new opportunities.

560: Respondent provides general comments in support of food-growing but acknowledges potential challenges in delivery. Moving into the Proposed ALDP, we will continue our existing policy position and broaden 'food-growing' to different types of projects in addition to allotments. This will align with the Council's forthcoming Draft Food Growing Strategy which will set out the Council's position on how to manage existing and new opportunities.

544, 620: Respondents note the benefits of food-growing and recommend links to the Local Outcome Improvement Plan (LOIP). The ALDP is prepared in line with other Council strategies, such as the LOIP. Food-growing will also be included in the Proposed ALDP based on the Council's Draft Food Growing Strategy which is aligned with the LOIP.

#### **Food-Growing – does not support**

291, 563: Respondent does not support the idea of food-growing in Aberdeen. Food-growing has been a feature in the extant ALDP and is present in various projects throughout Aberdeen. In line with legislation (Community Empowerment (Scotland Act 2015), the Council must prepare a Food Growing Strategy. The Proposed ALDP will align with that strategy and support the proven benefits of food-growing in its various forms.

#### **Food-Growing – general**

366: Respondents suggest that more land is required for allotments. The Proposed ALDP aims to broaden the scope of food-growing from the existing sole reference to 'allotments' in Policy NE3 (Urban Green Space) to incorporate different ways of delivering food-growing. This will align with the Council's forthcoming Draft Food Growing Strategy which will set out the Council's position on how to manage existing and new opportunities. Food-growing opportunities would be encouraged across the whole city, however the Council's Locality Plans do set out areas of priority around Aberdeen for such community projects.

367: Respondent suggests the Proposed ALDP could support community projects. Food growing will be supported through existing policy mechanisms (such as Green Space Network, Urban Green Space, etc) as a type of open space. Community projects are driven 'on the ground' which is separate to development planning. The Proposed ALDP and its policies will seek to protect and enhance the natural environment, allowing communities to enjoy projects in their area.

469: Respondent notes that access to green spaces should be encouraged. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural

Environment (including our water environment). The principle of our Natural Environment policies will be retained into the Proposed ALDP and we will continue to support the protection and enhancement of these spaces. This also applies to retaining and enhancing access to green spaces in new developments.

The Aberdeen City Council Open Space Audit reviews the city's open space in qualitative and quantitative terms, accessibility is also considered. This helps to inform where open space can be created or enhanced.

565: Respondent seeks further information on the topic and notes this should not be a further requirement of developers. Food-growing is a longstanding activity but is gaining increasing prominence following the Community Empowerment (Scotland) Act 2015 which sets legislative requirements of all Local Authorities. As a Council we should be protecting and enhancing food-growing opportunities wherever possible. Food-growing will form part of the open space provision options for new developments in policy of the Proposed ALDP.

451: Respondent notes some antisocial behaviour within allotments. Whilst this is not a matter that the ALDP can assist with, we recommend anyone experiencing antisocial or criminal behaviour should notify the police.

472: Respondents suggest green spaces are not lost to developers. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment (including our water environment). The principle of our Natural Environment policies will be retained into the Proposed ALDP and we will continue to support the protection and enhancement of these spaces. However, some land has been identified for development. Under existing Policy NE4 (Open Space Provision in New Development), the provision of allotments in new developments are supported as a type of open space. Moving into the Proposed A, we will continue to support this and broaden 'food-growing' to different types of projects in addition to allotments.

### **Food-Growing Policy**

367, 469, 472, 505, 540, 551, 574: Respondents support a new policy in the next ALDP. The Proposed ALDP aims to broaden the scope of food-growing from the existing sole reference to 'allotments' in existing Policy NE3 (Urban Green Space) to incorporate different ways of delivering food-growing. This will align with the Council's forthcoming Draft Food Growing Strategy which will set out the Council's position on how to manage existing and new opportunities.

505: Respondent encourages protection of existing food-growing spaces and more land should be identified for this. The Natural Environment is an important topic area; the Council's position has been consistent across past ALDP's whereby there is a presumption to protect and enhance the Natural Environment (including our water environment). The principle of our Natural Environment policies will be retained into the Proposed ALDP and we will continue to support the protection and enhancement of these spaces. Food growing will be supported through existing policy mechanisms (such as Green Space Network, Urban Green Space, etc) as a type of open space. Under existing Policy NE4 (Open Space



Provision in New Development), the provision of food-growing spaces in new developments are supported as a type of open space. Moving into the Proposed ALDP, we will continue to support this.

540: Respondent notes that flexibility for any policy proposals for food-growing should be retained. It is our intention that we will continue to support food-growing through existing policies, whilst broadening the general definition of 'food-growing' beyond allotments as it is currently understood. Open space requirements in new developments will continue, but meaningful and relevant spaces will be encouraged, and this may include provision for food-growing spaces, if relevant to the individual site and proposal, allowing a level of flexibility.

456: Respondent supports requirement for food-growing spaces in new development proposals. It is our intention that we will continue to support food-growing spaces through existing Natural Environment policies, whilst broadening the general definition of 'food-growing' beyond allotments as it is currently understood. Open space requirements in new developments will continue to be present, but meaningful and relevant spaces will be encouraged, so this may include provision for food-growing spaces, if relevant to the individual site and proposal

562: Respondent suggests identification of food-growing sites, and a related policy. The extant ALDP currently identifies green and open spaces through the Natural Environment policies that should be protected and enhanced (Green Space Network, Urban Green Space, etc), and these sites may also be supported for various types of food-growing projects. Food-growing will be supported through existing policies and through open space requirements of new developments.

599: Respondent suggests that large schemes should identify land for food-growing, and City Centre/ brownfield sites may not be suitable for food-growing. Food-growing opportunities will be supported under Policy NE2 Green & Blue Infrastructure in the Proposed ALDP - i.e. open space requirements in new development – if the site and proposal is appropriate. City Centre and brownfield sites may present different challenges to food-growing projects as noted by the respondent, but as highly-accessible locations, and in order to maximise the social and environmental benefits of food-growing projects, all locations should be considered for such projects.

620: Respondent suggests ways that food-growing can be delivered. Food-growing opportunities will be supported under policy NE2 Green & Blue Infrastructure in the Proposed ALDP - i.e. open space requirements in new development – if the site and proposal is appropriate. Various methods will be considered and aligned with the Council's Draft Food Growing Strategy.

#### **Planning authority action/recommendation for Proposed Plan**

Policy restructure for the Natural Environment section (NE policies) is taken forward as proposed within the Main Issues Report, however Trees and Woodland is being taken forward as a standalone policy.

Reference to the term 'Zone of Influence' in Trees and Woodland policy guidance is to be removed. The policy has been prepared in consultation with Environmental Policy colleagues.

Support for food-growing is acknowledged and will be supported in the Local Development Plan via existing policy; for example, featuring within Green and Blue Infrastructure guidance, and Open Space in New Development guidance.

<b>Issue 12</b>	<b>Transport and Infrastructure</b>
<b>Section of the MIR to which the issue relates:</b>	Section 5 Transport and Infrastructure
<b>Planning authority's summary of the comment(s):</b>	
<b><u>City Centre Parking</u></b>	
<p>099, 361, 367, 422, 481, 562: Agree with preferred approach to reduce parking.</p> <p>018, 020, 022, 037, 061, 110, 271, 284, 285, 291, 451, 456, 472, 473, 479, 542, 544, 550, 554, 560, 574, 599: Disagrees with reduced parking.</p> <p>003, 005, 479: Parking must be available in the city centre, 479: and on approaches.</p> <p>018, 574: Appropriate parking locations should be considered.</p> <p>061, 110: Lack of parking keeps people from the city centre.</p> <p>099: Extend Controlled Parking Zones and constrain parking in new developments to be consistent with the findings of the SCPR and with LDP principles.</p> <p>138: Reducing parking will encourage people to use out of town shopping centres.</p> <p>138: Increase in alternative fuel vehicles will improve air quality and city centre parking will become less of an issue.</p> <p>284: Parking should be free.</p> <p>318: Provide shuttle from periphery car parks.</p> <p>361: Pedestrianisation and restricted road use will reduce parking requirement.</p>	

368, 479: Reducing parking will make city centre more difficult to navigate.

390: Parking is required to ensure city centre vibrancy.

445, 451, 574, 599: Public transport has to be improved before car parking can be reduced.

469: Instigate a charging zone.

472: Some car parks require upgrading. Make evening car parking free to encourage people to visit the city centre.

481: Accessing city centre should be balanced by car parking needs associated with different development.

563: More affordable parking needed.

627: Notes car-reliance in the city.

### **Transport Infrastructure Improvements**

020: Road system and access should be improved and there should be better park and ride facilities.

097: Traffic on Howes Road is increasing, and road condition is deteriorating.

110, 619: Improve facilities and accessibility to allow drop-offs at the train and bus stations.

286: Prioritise resurfacing of roads.

291: Build new car parks and have ticketed parking to control numbers – make it free for a limited time.

362: Infrastructure proposals should respect the operation of Garthdee Retail Park.

619: Consider rail links to secure Aberdeen's place as a regional centre.

### **Public Transport**

061, 110, 285, 627: Public transport needs should be improved.

099: LDP should acknowledge City Council are members of the North East Bus Alliance, working in partnership to encourage enhanced bus services in the city.

366: Publicly owned bus service.

451: Private bus companies only provide what is profitable.

472: Public transport routes are declining in Bridge of Don.

619: Better connectivity between communities by public transport.

### **Hydrogen**

138: Supports hydrogen-powered transport – the Council should keep up with emerging developments.

472: Queries hydrogen.

### **Active Travel**

285: Need bicycle parking and lanes.

286, 368, 552, 562: Supports pedestrianisation and cycling.

422: CCMP notes relocating car movement and improving cycling.

451: Cycle routes are inconsistent and unsafe – cyclists and pedestrians should be segregated.

469: Remove parking from major roads to provide space for segregated cycle lanes.

624: Welcomes promotion of sustainable and active travel.

627: Use of pavements for cycling must be stopped.

### **Electrical Vehicle Charging Infrastructure**

#### *Support for Option 1 – Current Approach*

286, 366, 451, 472 473, 477, 488, 540, 542, 565, 591: Supports option 1.

#### *Support for Option 2 - Preferred Approach*

018, 022, 138, 271, 291, 318, 361, 367, 368, 422, 445, 456, 472, 544, 549, 552, 554, 560, 562, 563, 574, 633: Agree with preferred approach.

599: Preferred approach will help those who commute to town.

#### *General Comments on Electric Vehicles*

003: Have radical approach to electric vehicle charging points to achieve government targets.

445: Government needs to set dates to ban vehicles over a certain age, diesel and petrol engines.

456: Establish policy which strongly favours non-polluting vehicles.

488, 610: Flexible approach needed rather than a blanket policy.

020: Research and costing of technologies is required.

022: Require retailers with parking for 3 or more cars to provide charging points.

138: Additional charging points are needed.

619: More electric charging points needed at the beach.

284: Pay to charge per hour.

469: Provide more on street charging points via plug in points in lamp posts.

469: Require existing businesses with car parking to provide charging points.

472: Create more spaces within existing multi-storey car parks.

366: Uptake of electric vehicles doesn't justify more infrastructure.

451: Council should not spend lots of money on unknown and emerging infrastructure.

473, 477: Should be dictated by the market, 477, 488, 591: to reduce risk of technology being implemented before it is well used and becomes outdated.

488: Better to ensure housing and development sites are adaptable to allow retrofitting.

540, 542, 565: Insufficient confidence that the solution is electric cars.

540: Insisting on installation of charging facilities will waste finances.

544: Policy should ensure users of health centre buildings benefit from charging points rather than local residents.

565: No legislative requirement for the preferred option.

591, 610: Burden is placed on developer.

488, 565, 591: Industry concerns of the network's capacity to accommodate increase in demand.

488, 591, 610: Building Standards are reviewing EV requirements and standards which will come to effect in 2021, and 591, 610: LDP should not contradict this.

### **Digital Infrastructure**

#### *Support approach*

003, 005, 018, 020, 022, 037, 138, 291, 361, 367, 445, 451, 456, 469, 472, 479, 542, 544, 549, 554, 560, 562, 563, 574, 599, 619: Agree with approach, 451: as long as minimum standard is not set unrealistically high.

### *General Comments on Digital Infrastructure*

286: Broadband is not essential.

138: Full fibre should replace cabinet broadband and 5G should be introduced.

138: Need to ensure homes in rural fringes have access to highspeed broadband.

284: Broadband firms should make sure country is covered.

451: New flats should be required to install communal television and satellite aerials to prevent eyesore.

479: Ensure all existing houses have access to broadband.

542: Queries how this can be checked.

599: Council should ensure telecoms providers will upgrade services.

488, 565: Suggested approach is outwith the control of the developer.

591: Financial burden is placed on developer.

488, 565, 591: Council should engage with infrastructure providers to ensure networks are in place to support new development.

540: Delivery should be market led by developer and not a planning requirement.

619: Ongoing research required into possible health impacts (carcinogenic effects) of public Wi-Fi.

### **Harbour Expansion**

486: Welcomes inclusion of Harbour Expansion as a major committed transport scheme. Additional proposed infrastructure improvement within the Bay of Nigg Development Framework should be included in the 2022 local development plan.

### **Air Quality**

099: MIR should mention reduction of traffic pollution and proposals to implements the Low Emission Zone in the city centre.

619: Further improvement required for management zones – more robust procedures for monitoring areas of likely emissions.

## **Strategic Transport Fund**

624: Concerned about absence of a replacement mechanism for Strategic Transport Fund to mitigate cumulative impact on the trunk road network. The potential impact on the trunk road or rail network of the preferred sites is not significant. A Background Report published alongside the Proposed Plan is required to set out the transport work the Council is undertaking. Council's position on Dyce area transport appraisal is welcomed. Welcomes ongoing Roads Hierarchy Study. Notes the work the Council is undertaking appears proportionate and in line with DPMTAG.

### **Summary of response by planning authority:**

#### **City Centre Parking**

018, 020, 022, 037, 061, 110, 271, 284, 285, 291, 451, 456, 472, 473, 479, 542, 544, 550, 554, 560, 574, 599, 003, 005, 479, 574, 099, 138, 284, 318, 361, 368, 390, 445, 599, 469, 472, 481, 563, 627:

Aberdeen City Council recognises the importance of high-quality car parking that is accessible to all users and inclusive of their needs. Easy access to the city centre by sustainable transport modes and careful consideration of the balance and location of car parking is crucial to minimising traffic. The Nestrans Regional Transport Strategy Refresh 2013 supports the enforcement of parking restrictions, particularly where these exist to support strategic traffic movements, bus/pedestrian priority and road safety. The Scoping Report for the Nestrans Regional Transport Strategy 2040 notes that consideration will be given to parking policies and roads hierarchy to encourage more public transport journeys. It notes the City Centre Masterplan and Delivery Programme (CCMP) 2015 as an excellent example of mechanism that will set the framework to prioritise bus access, relocate vehicle movements and improve the quality of urban space within the city centre.

The CCMP 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 which exacerbates traffic problems in the area. At its City Growth and Resources Committee on 6 June 2019, Aberdeen City Council approved the implementation of a revised Roads Hierarchy Strategy, the drafting of a Car Parking Strategy and the consultation of the draft Sustainable Urban Mobility Plan (SUMP). All these documents will contribute to meeting the transport aims of the CCMP. The Revised Roads Hierarchy has developed a network that makes best use of the Aberdeen Western Peripheral Route by taking advantage of the newly freed-up road capacity within the city and it facilitates delivery of transport elements of the CCMP by providing a means of reducing through-traffic in the city centre.

The Car Parking Strategy will be informed by the 2017 Strategic Car Parking Review (SCPR), which considered the city's economic, social and environmental wellbeing and how current parking provision fits with Aberdeen City Council's strategic transport and land use plans. The Strategy will consider and take forward actions and recommendations set out in the SCPR. These include reviewing the feasibility of low and car-free developments in the

city centre, assessing the implications of Scottish Government Low Emission Zone requirements, establishing a Quality Parking Partnership for city centre parking to include private operators and introduction of additional controlled parking zones in North Dee and the Beach. The SUMP is a long-term transport strategy for the city centre which identifies measures to be implemented by Aberdeen City Council and partners to enable and encourage residents and visitors to travel on foot, bike, public transport or other low-emission forms of transport.

Continuing to provide high levels of car parking in the city centre will encourage private vehicle use and will 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 the proposed 'zero parking' for new development will help facilitate a more attractive centre that is also safer for pedestrians. It will also help achieve the objectives set out in the CCMP.

### **Transport Infrastructure Improvements**

020, 097, 110, 619, 286, 291: There are policies and guidance in place at local, regional and national level to ensure that development mitigates against its impact. As a Roads Authority, the Council has an ongoing programme of infrastructure and maintenance works which is delivered on a priority basis where funding allows. This includes the maintenance of park and ride facilities.

362: In respect to Garthdee Retail Park, any infrastructure proposals within close proximity to the Park would include consultation. Aberdeen City Council is committed to the improvement of rail links.

619: The Proposed Aberdeen Local Development Plan (ALDP) will continue to safeguard land for improved rail services including new stations.

### **Public Transport**

061, 110, 285, 627, 099, 366, 451, 472, 619: Aberdeen has a dense public transport network, consisting of a wide range of bus services connecting residential neighbourhoods with places of employment, education, leisure and retail. Although routes, frequencies and prices are the responsibilities of private operators, the Council works with operators and other partners to improve the punctuality and reliability of services, to improve public transport infrastructure, to promote public transport services and to pilot new initiatives. Aberdeen City Council also work together with Nestrans to address problems that act as barriers to linking employment, retail/leisure and residential areas with a sustainable, connected public transport network.

099: The Proposed ALDP acknowledges that enhanced bus service provision as a transport intervention option in the city.



## **Hydrogen**

138, 472: Support for hydrogen-powered transport is welcomed and noted. With just under a quarter of Scotland's emissions coming from transport, the use of hydrogen in transport will help the transition to a low carbon economy. Hydrogen fuel cells contain no harmful emissions from the exhaust and can help to improve air quality and reduce air pollution. Aberdeen City has continued to build its reputation as a global energy innovator with its fleet of 60 hydrogen vehicles with a combination of single decker buses, vans, cars, waste trucks and road sweepers. Aberdeen City Council is committed to pursuing new innovative hydrogen technology projects in order to accelerate the commercial use of hydrogen as a fuel, offering green transport solutions.

## **Active Travel**

285, 286, 368, 552, 562, 422, 451, 469, 624: High quality facilities that enable and encourage people to walk and cycle are important. Aberdeen City Council appreciates that it has responsibility for the current transport network and that a series of improvements and additions are required to ensure the City becomes a more welcoming place for pedestrians and cyclists. Such improvements have been delivered and are continuing to be delivered throughout the City on a priority basis and as funding allows. The Council recognises that active travel infrastructure must be connected and integrated to allow seamless journeys across the City and longer-distance journeys to and from Aberdeenshire. The Proposed ALDP therefore aligns with the aspirations of the SDP and the Regional Transport Strategy in respect to a long-distance active travel network. The Proposed ALDP continues to expect provision of secure cycle parking for developments.

627: With regards to cycling on pavements, the Council will continue to support, where appropriate, cycling clubs/groups trainings aimed at the public. The Council website also contains information on cycling safely.

## **Electrical Vehicle Charging Infrastructure**

### *Support for Option 1 – Current Approach*

286, 366, 451, 472 473, 477, 488, 540, 542, 565, 591: Support for option 1 is noted.

### *Support for Option 2 - Preferred Approach*

018, 022, 138, 271, 291, 318, 361, 367, 368, 422, 445, 456, 472, 544, 549, 552, 554, 560, 562, 563, 574, 599, 633: Agreement with preferred approach is welcomed and noted.

### *General Comments on Electric Vehicles*

003, 445, 456, 488, 610, 020, 022, 138, 619, 284, 469, 472, 366, 451, 473, 477, 488, 591, 540, 542, 565, 540, 544, 565, 591, 610: Scottish Government's ambition is to phase out the need to buy petrol and diesel engine cars and vans by 2032, eight years ahead of the UK Government (Climate Change Plan 2018). This is expected to be driven by significant uptake of electric and hydrogen vehicles and will help to reduce carbon emissions. Electric vehicle charging points enable residents to adopt an emission-free mode of independent transport and therefore are one of the initiatives that the Council promotes and encourages

to reduce the carbon footprint in Aberdeen. There has been a recent increase in the use of electric vehicles, and this requires provision of infrastructure to support changing technologies. Requirement for such infrastructure provision in the Proposed ALDP will help achieve Scottish Government's objective to decarbonise road transport by 2050 (Low Carbon Scotland, 2013). The Proposed ALDP does not include a blanket policy on electric vehicle charging, but rather includes a requirement for electric vehicle charging as part of a wider policy. Specific ratios will be set out in Aberdeen Planning Guidance (APG). These will vary for each development. Aberdeen City Council is preparing an Electric Vehicle Strategy which will include detail on tariff setting for charge points and future locations. Where car parks are Council-owned, the Council will be able to install additional charge points where appropriate. The extant Transport and Accessibility Supplementary Guidance, which will be carried forward as APG, also encourages developers and businesses to provide appropriate charging infrastructure for new development.

488, 565, 591: Nationally, Transport Scotland is currently working with Distribution Network Operator's (DNOs) to ensure there is sufficient capacity to accommodate charging points. At local level, the Council engages with our local DNO, Scottish and Southern Energy (SSE) to ensure that sufficient power requirements exist for any new sites taken forward. Existing guidance also encourages developers to engage early with SSE to ensure that new developments have sufficient power requirements built in from the start.

488, 591, 610: There are currently no requirements within Building Standard Technical Handbooks for electric vehicle charging in Scotland. There are ongoing discussions in England of the intention to introduce legislation and incorporate electric vehicle charging into building regulations however this is not applicable to Scotland. Therefore, the Proposed ALDP does not contradict any Building Standards requirements with regards to electric vehicle charging infrastructure.

## **Digital Infrastructure**

### *Support approach*

003, 005, 018, 020, 022, 037, 138, 291, 361, 367, 445, 451, 456, 469, 472, 479, 542, 544, 549, 554, 560, 562, 563, 574, 599, 619: Agreement is noted and welcomed.

### *General Comments on Digital Infrastructure*

286: Improved digital connectivity is a key component of a sustainable community. Scottish Planning Policy (SPP) notes that efficient digital connections help to achieve sustainable growth. They are an essential part of Aberdeen's economic and social growth. The SDP also states that the roll-out of high-speed broadband throughout the area is vital for the economy as well as bringing social and environmental benefits.

138, 284, 451, 479, 542, 599: Aberdeen is the first city in Scotland to benefit from gigabit-capable full fibre broadband. There is an ongoing roll-out of high-speed gigabit speed broadband throughout the entire city which will help to create an inclusive society. Existing policy encourages residential and commercial development to have access to high-speed

broadband. This would be applied in the assessment of planning applications. This policy approach has been taken forward into the Proposed ALDP.

488, 565, 591, 540: SPP supports digital connectivity and urges local development plans to encourage developers to explore opportunities for the provision of digital infrastructure to new homes and business premises as an integral part of development. Both the public and private sectors will need to work together in order to deliver digital infrastructure improvements. Existing improvements to digital infrastructure are funded through both public and private investment supported by grants from the UK and Scottish Governments.

619: The safety of telecommunications equipment and Wi-Fi is established at national level, supported by scientific research and evidence. It would not be appropriate for the proposed ALDP to revisit national safety standards and there are no intentions to do so.

### **Harbour Expansion**

486: The Proposed ALDP will continue to safeguard land for the Aberdeen Harbour Expansion project. With regards to additional proposed infrastructure improvements within the Bay of Nigg Development Framework, this has been dealt with under Issue 6 – Alternative Sites.

### **Air Quality**

099, 619: Aberdeen City Council is working towards the development and implementation of a Low Emission Zone to improve air quality in the city centre where levels currently exceed national air quality objectives. Monitoring is undertaken in accordance with national guidance. The data from the 6 continuous monitoring sites is checked daily and adjusted as appropriate by a third party contracted by the Scottish Government. The third party also undertakes 6 monthly audits of the equipment. Non-continuous monitoring via diffusion tubes is also undertaken at approximately 70 sites in accordance with national guidance. The tubes are analysed by the public analyst who is accredited to undertake this work.

### **Strategic Transport Fund**

624: Concerns are noted. Aberdeen City Council agrees that the potential impact on the trunk road or rail network of the preferred sites is not significant. A Background Report will be prepared alongside the Proposed ALDP setting out transport work the Council is currently undertaking.

### **Planning authority action/recommendation for Proposed Plan**

Encourage zero-parking in the city centre in alignment with the City Centre Masterplan while considering the needs of disabled individuals.

Continue to safeguard land for existing transport infrastructure improvements.

Include the requirement for electric vehicle charging points as part of policy.

Include details on the development and implementation of Low Emission Zones within the Plan.

Prepare a Transport Background Report to accompany the Proposed Plan.

<b>Issue 13</b>	<b>Developer Obligations</b>
<b>Section of the MIR to which the issue relates:</b>	Section 5.5 and Question 21 Developer Obligations
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Existing Policy/ Process</b></p> <p>005: Respondent suggests the process should be reviewed to ensure the contributions sought are actually obtained; the developer should not be allowed to provide less than what has been agreed.</p> <p>018, 022: Process needs to be more specific and ensure it can be enforced</p> <p>020: Developers should be legally tied to their obligations</p> <p>110: Respondent believes that developers do not always adhere to legal agreements for developer obligations. The Council should enforce these.</p> <p>472: Developers should be required to provide amenities and not be allowed to change what has been agreed.</p> <p>020: Respondent believes developers should not be allowed to provide less than required for affordable housing contributions</p>	

271, 574: Contributions should still be paid but the process needs to be more transparent in terms of the projects being identified. More stakeholder engagement is needed.

390: Respondent comments that the Council should ensure developers carry out obligations included in their proposals.

445: Developer contributions should not have loopholes – developers must be responsible for costs associated with roads and services

565: Respondent suggests greater transparency is required in the process. Suggests a flexible approach when seeking contributions from developers in the interests of viability.

591, 610: Respondent believes there is a reliance on developer obligations and that policy and supplementary guidance are not in line with the tests of Circular 3/2012. Respondent seeks greater transparency on the methodology for calculating contributions and there should be a method to return unspent funds.

384: Respondent supports the principle of developer obligations. It is suggested that Network Rail is excluded from this process as a publicly owned company.

### **Change Current Approach**

037: Agree

061: Respondent thinks developers should be required to provide adequate green space, play areas etc. Community Facilities must be given greater importance.

099: Respondent suggests there needs to be a mechanism to assess cumulative impacts of development and funding. The issues that the Strategic Transport Fund tried to address still remain.

318: A balance needs to be found between making development a contingent of the developer's compliance to their obligations.

451: Respondent recommends additional developer obligations should be sought for as follows; green infrastructure, carbon footprint reduction during construction, use of sustainable/ local materials.

469: If the obligations are not high enough to cover the costs of development then there should be an increase in the amounts required

599: Respondent suggests a list of desired infrastructure improvements made with communities. Suggests that a change in national policy may be required.

619: More effective and informed use of funds through community engagement. Use of funds should be based on the needs of the community, agreed through consultation.

633: Support for strategic infrastructure of developments (i.e. regional scale), reference made to proposed public art contributions and how this should apply to blue-green infrastructure.

### **Retain Current Approach**

361, 549: Agree

488: Due to the uncertainty of emerging Planning legislation, the current LDP should not change its approach

291: Respondent believes the process should be retained but allow a greater focus on delivery.

### **Developer Obligations Funds**

138: Respondent has noted that the rate of developer obligations is often lower when comparing against profits of development. Developers should not be allowed to avoid paying these. The funds should be kept within the immediate area of the development. Developers should minimise the disruption to travel links during new development and give compensation to drivers by paying for road improvements.

### **Other**

284: Respondent believe there is no need for more development.

542: Respondent does not support new development when there are vacant buildings in the city.

## **Summary of response by planning authority:**

### **Existing Policy/Process**

5, 18, 22, 20, 110, 472: The respondents comment on the reliability of the current process in securing funds from developers for Developer Obligations.

Aberdeen City Council, in line with the Town and Country Planning (Scotland) Act 1997 and the Planning (Scotland) Act 2006, set a requirement for Developer Obligations within the Development Management process for certain development proposals. These obligations are calculated in line with the relevant policy guidance and are secured by a Section 75 Legal Agreement between the applicant and the Council. In line with the associated legal agreement, the Obligations must be paid at the specified time. As the legal agreement is registered against the land, it continues to apply if the site is sold to a different developer. Under Section 75 (A), an amendment can be sought to the agreement, should there be a change in circumstance. This must be agreed by all parties.

As stated within the Main Issues Report, Developer Obligations are an important way in which development and infrastructure is funded, however it cannot be relied upon for all

matters. If it can be demonstrated that the viability of development is adversely impacted by the proposed Obligations, then a negotiation may be required.

20: Paragraph 129 of Scottish Planning Policy 2014 states that “The level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses”. As such Aberdeen City Local Development Plan seeks the maximum affordable housing contribution allowed in line with Scottish Planning Policy of 25% of total proposed units for developments of five or more units. We do not propose to change this requirement in the next Plan.

Our preference is always an ‘on-site’ delivery of affordable housing, however in special circumstance, we may accept off-site delivery or a commuted sum in lieu of developed units on-site.

If the proposal does not meet the policy requirements for any given reason it would likely not be in line with Policy H5: Affordable Housing and therefore may not be supported by the Council.

The Council has to take account of development viability when considering affordable housing requirements. In exceptional circumstances, if it can be demonstrated that the normal affordable housing requirement would make a site economically unviable, then the requirement may be reduced

271, 574, 390, 445, 565: Although the principle of the Developer Obligations policy will be carried forward into the next Plan, we acknowledge the comments provided on the transparency of the process overall.

The sums and calculations of Developer Obligation payments are enclosed within Supplementary Guidance presently. This sets out the amounts required for various contributions (education, open space, healthcare...)

The Developer Obligations process is handled by our dedicated team which, although linked, is separate to the Local Development Plan. This team is consulted during the Development Management process to calculate relevant sums and facilitate Section 75 legal agreements between the Council and the applicant. This team have also been piloting the development of Community Asset Plans in consultation with other internal services and communities in order to provide more clarity on the projects for areas in which Developer Obligations funds will be sought and utilised. These are pilot Plans which are being prepared and we hope these can be implemented city-wide in due course.

The Planning (Scotland) Act 2019 also includes provisions to increase the transparency of the developer obligations process in the future. These include requirements to publish legal agreements online and to produce an annual report to provide a summary of all live developer obligations / legal agreements.

We will continue to work on ways in which the process is more transparent to a variety of stakeholders.

591, 610: As noted within the Main Issues Report, Developer Obligations are an important tool in securing funds to deliver much-needed infrastructure associated with proposed development. Development pressures may lead to increased pressures on community assets and infrastructure therefore it is important that these are mitigated wherever possible. Developer Obligations are calculated using formulae set out in Supplementary Guidance, and this approach is fully compliant with the requirements of Circular 3/2012. These calculations are carried out and provided during the Development Management process in consultation with the Developer Obligations Officer. The Supplementary Guidance may be reviewed in due course to set out this information better.

There are already provisions for unspent Developer Obligations to be returned to developers, and clauses to enable contributions to be returned if they remain unspent after a specified time period (typically 7 years from date of final payment) are normally included in legal agreements.

384: All projects and planning applications are assessed on their own circumstances. Rail improvement projects are unlikely to require Developer Obligations as these are infrastructure projects, however the Council will discuss individual projects wherever necessary.

### **Change Current Approach**

37: We note the comments noting changes to the current process for the next Plan. We intend to retain the process, with some minor changes to the presentation of the policy requirements and information, in-keeping with Scottish Planning Policy and relevant legislation.

61: The respondent supports delivery of adequate green space and play areas, with community facilities being given greater importance. Our current Developer Obligations process seeks funds for a number of different services and these include; community facilities, open space, core paths, allotments and sports & recreation (where relevant and where provision is not made on site as an integral part of the development). Developer Obligations funds are assessed on the basis of the proposed development and the context of the site.

99: The cumulative impact of other planned development in the area is taken into account when the Developer Obligations for individual planning applications are being considered. However, all Developer Obligations that we seek must be clearly related to the proposed development (either as a direct consequence of the development or because of the cumulative impact of development in the area). This means that we cannot seek Developer Obligations towards infrastructure and facilities that do not have a clear relationship with the development in question.

318: Aberdeen City Council, in line with the Town and Country Planning (Scotland) Act 1997 and the Planning (Scotland) Act 2006, set a requirement for developer obligations within the Development Management process for certain development proposals. These obligations are calculated in line with the relevant policy guidance and are agreed by a Section 75 Legal Agreement between the applicant and the Council.



Under Section 75 (A), an amendment can be sought to the agreement, should there be a change in circumstance. This must be agreed by all parties.

As stated within the Main Issues Report, developer obligations are an important way in which development and infrastructure is funded, however it cannot be relied upon for all matters. If it can be demonstrated that the viability of development is adversely impacted by the proposed obligations, then a negotiation may be required. In line with the associated legal agreement, the obligations must be paid.

451: The respondent supports additional developer obligations for green infrastructure, carbon reduction and sustainable construction methods. Our current developer obligations process seeks funds for a number of different services including; healthcare, education, community facilities, as well as blue-green infrastructure requirements such as; open space, core paths, regional SuDS, and sports and recreation. The Development Management and Building Standards processes will review details of the proposed development and construction methods, seeking to promote sustainable options wherever possible.

469: We seek to obtain Developer Obligations that are relevant and proportionate to the development being proposed. This is in line with the relevant guidance and legislation. Developer Obligations should not impact upon the overall viability of the development and so the calculations are set out in Supplementary Guidance that accompanies the Local Development Plan to ensure transparency. The developer contribution rates in the Supplementary Guidance may be reviewed in due course to ensure they remain up to date and appropriately reflect the cost of providing the infrastructure and facilities required to support new development.

599: The respondent notes that desired infrastructure improvements should be agreed in conjunction with communities – suggests a change in national policy may be required. The Developer Obligations process is handled by our dedicated team which, although linked, is separate to the Local Development Plan. This team is consulted during the Development Management process to calculate relevant sums and facilitate Section 75 legal agreements between the Council and the applicant.

This team have also been piloting the development of new Community Asset Plans in consultation with other internal services and the community in order to provide more clarity on the projects for which Developer Obligations funds will be sought and utilised. These are pilot Plans which are being prepared and we hope these can be city-wide in due course. We will continue to work on ways in which the process is more transparent to a variety of stakeholders.

The Planning (Scotland) Act 2019 received royal assent in July 2019, however detailed guidance in relation to the implementation of its contents has not yet been released. This may include further detail on the future direction of developer obligations, however a timescale for this has not yet been made available.

619: The respondent notes that there should be effective and informed use of developer obligations funds within communities. The use of funds should be agreed through consultation with the community.

The Developer Obligations process is handled by our dedicated team which although linked, is separate to the Local Development Plan. This team is consulted during the Development Management process to calculate relevant sums and facilitate Section 75 legal agreements between the Council and the applicant.

This team have also been preparing new Community Asset Plans in consultation with other internal services and the community in order to seek areas in which developer obligations funds can be utilised. These are pilot Plans which are being prepared and we hope these can be city-wide in due course. We will continue to work on ways in which the process is more transparent to a variety of stakeholders.

633: The respondent supports strategic infrastructure for developments (i.e. on a regional scale) and refers to the public art section of the Main Issues Report, noting that this should apply to blue-green infrastructure. Our current Developer Obligations process seeks funds for a number of different services including; healthcare, education, community facilities, as well as blue-green infrastructure requirements such as; open space, core paths, regional SuDS, and sports and recreation. Infrastructure may also be agreed through the design process when a planning application is considered instead of a commuted sum.

### **Retain Current Approach**

361, 549: We note the respondents support the retention of the current approach to developer obligations in the Local Development Plan. The 2022 Plan will retain its approach to Developer Obligations with regards to policy mechanisms.

488: Respondent notes the emergence of new Planning legislation so the Plan should not change its approach to Developer Obligations. The Planning (Scotland) Act 2019 received royal assent in July 2019. Detailed guidance and secondary legislation to specify the implementation of its contents is yet to emerge. The 2022 Plan will retain its approach to Developer Obligations with regards to policy mechanisms and relevant guidance; some aspects may be updated to reflect the current context of Obligations which will form additional guidance that accompanies the Local Development Plan. However, until secondary legislation to the Act is made available, the overall approach will not be changed in the Local Development Plan.

291: We agree that there should be a proportionate focus on delivery of new development and infrastructure. This is a consistent approach for the country as a whole; reflected in the recent Planning (Scotland) Act 2019 and its updates to reflect a greater focus on delivery. We will work with applicants to find how this can be achieved.

### **Developer Obligations Funds**

138: The respondent believes that developers should make greater contributions as a result of proposed developments and should not be allowed to avoid payment of these. The funds

should be retained within a close proximity of the development area and disruption during construction phases should be minimised.

Aberdeen City Council, in line with the Town and Country Planning (Scotland) Act 1997 and the Planning (Scotland) Act 2006, set a requirement for Developer Obligations within the Development Management process for certain development proposals. These Obligations are calculated in line with the relevant policy guidance and are secured by a Section 75 Legal Agreement between the applicant and the Council. In line with the associated legal agreement, the Obligations must be paid at the specified time. As the legal agreement is registered against the land, it continues to apply if the site is sold to a different developer. Under Section 75 (A), an amendment can be sought to the agreement, should there be a change in circumstance. This must be agreed by all parties.

As stated within the Main Issues Report, Developer Obligations are an important way in which development and infrastructure is funded, however it cannot be relied upon for all matters. If it can be demonstrated that the viability of development is adversely impacted by the proposed Obligations, then a negotiation may be required. In line with the associated legal agreement, the Obligations must be paid.

#### **Other**

284, 542: The Local Development Plan is required to meet the housing and employment land allowances identified in the Strategic Development Plan. Whilst it is a preferential for brownfield sites and the redevelopment of existing sites to meet these allowances, sometimes new development is necessary in order to accommodate the identified needs of the Plan.

As a Planning Authority we will generally welcome the redevelopment of vacant buildings in the city, however as many of these may be in private ownership they are beyond our control.

#### **Planning authority action/recommendation for Proposed Plan**

No significant changes proposed.

<b>Issue 14</b>	<b>Resources and Heat Networks</b>
<b>Section of the MIR to which the issue relates:</b>	Main Issue 6 – Low and Zero Carbon Generating Technologies and Water Efficiency and Main Issue 7 – Heat Networks
<b>Planning authority's summary of the comment(s):</b>	
<b><u>General</u></b>	
<p>3: Ensure the highest standards of Energy Performance Certification is adhered to for new builds.</p> <p>9: Para 6.1 of the Main Issues Report - reference should be made to the development of the district heating network, the resultant carbon emission reduction, and future development of the network.</p>	
<b><u>Existing ALDP 2017 Policy</u></b>	
<p>95: Existing Policy R8: Renewable and Low Carbon Developments and the SG on Wind Turbine should be retained but amended to make reference to pipeline consultation zones and wind turbine development. Text below to be added as point within Policy R8 "Any turbines proposed within pipeline consultation zones must accord with the requirements of the Health and Safety Executive's land use planning advice 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".</p> <p>633: Welcomes an update from the Council on the success of existing Policy R7 and supplementary guidance in achieving carbon reduction, and from Scottish Water on water supply and treatment in the city.</p>	
<b><u>Main Issue 6: Low and Zero Carbon Generating Technologies and Water Efficiency</u></b>	
<i>Option 1 – Current Approach</i>	
318, 366, 441, 477, 488, 540, 542, 565: Support Current approach	
318: Policies are set at national level and local authorities should not impose.	
488, 565, 591: It is more appropriately implement, manage and calculate through Building Standards.	
488: Main calculation methodology SAP11, set for launch in 2022 is currently being developed. The increases in Building Standards (2021) will assist in fulfilling the authority's objective of reducing carbon emissions.	

540: Development industry faces continual conflict between planning policy and Building Standards. Often the most cost-effective way of complying with both sets of requirements is not the most energy efficient approach. Current planning policy does not encourage us to use less energy, which should be the ultimate aim.

610: Requirements of Policy R7 are too onerous. Many aspects would be more appropriately addressed through Building Standards.

565: Misleading by cross-reference to Supplementary Guidance. Believes that ACC do not understand the implications of platinum rating; estimated additional cost to constructing a home is in excess of £75,000. In addition to developer obligations, affordable housing, open space it impacts on viability. This is not a requirement by other planning authorities; risk of halting housebuilding in Aberdeen if preferred approach is pursued.

477, 591: Focus should be on upgrading existing older stock as new stock is efficient.

540, 591, 610: Fabric first approach is the most efficient tool to reduce emissions. Technology impacts on viability, which might require cost savings in the fabric, thereby potentially reducing efficiency.

591: Policy is too onerous, not directly reflected through SPP which advocates a holistic approach, with the onus is on planning authorities to be more proactive in identifying opportunities for co-location of development with a high heat demand with sources of heat supply.

477: Carbon emission reductions for new developments are not value for money. A phased approach allows the industry to adapt and strike a pragmatic balance between energy efficiency and delivery (as is outlined in Supplementary Guidance).

542: Green sustainable ideas are good however if the UK were to cease all CO2 emissions, global warming would continue. The UK is only responsible for 1% of emissions. If progress is to be made then restrictions should be imposed on China, US and India.

### *Option 2 – Preferred Option*

18, 22, 271, 361, 367, 422, 456, 472, 544, 549, 554, 560, 562, 563, 574, 599: Support preferred option

422, 549: Would support the aims of the Climate Change Act/ effectively combat climate change.

544: Impacts of climate change are a significant risk to public health. Carbon- reduction actions are an important factor to safeguard population health for the future.

574: Joint City/Shire working to encourage government investment into hydro power, complementing wind and solar schemes. Notes that loss of habitats in the creation of dams/ reservoirs can be tolerated for a greater benefit.

### *Option 3 – Alternative Option*

138, 445, 451, 469, 522: Support alternative option

138: Aberdeen should do more to help meet international obligations on carbon reduction. Main focus of developers has been on insulation new buildings, but greater emphasis should be placed on incorporating solar technologies and heat pumps rather than heating with fossil fuels. Respondent notes that commercial buildings are often lit and waste energy during night-time. They recommend the Council should work with employers to discourage this practice.

445: The strongest action is needed to mitigate further degradation.

451: Encouragement should be made to retain and upgrade existing properties. Discouraging the destruction of non - domestic buildings to create a clear brownfield site. The re-use and upgrade of existing buildings would, in most instances, significantly reduce the overall carbon cost.

469: A large proportion of Aberdeen's CO2 emissions come from residential sources; it is currently unlike to meet its current obligation under the climate change Act. To meet climate change head on, action must be taken now rather than waiting for the next round of planning.

### **Q22 Low and Zero Carbon Generating Technologies, and Water Efficiency**

138: Respondent queries how Aberdeen takes account of the oil and gas industry when calculating the City's contribution to emissions. Respondent recommends consideration be given to the impact of the AWPR on total emissions as it may have reduced in the city centre but will have increased in the outskirts.

284: Plant more trees.

291: Use global standards for calculations.

318: Should be in accordance with legally enforceable standards

361: The Council should use whichever methodology is adopted nationally

367: Council should use methodology accepted by experts

451: Established frameworks exist and ACC could develop a methodology with the help of a suitable consultancy

574: Council should seek expert opinion.

445: This is an extremely complex calculation and open to misinterpretation and furthermore very difficult to police

456: Not certain but do not make the mistake of formulating a quick hard & fast method which might be obsolete 24 months later. This is still a moving target and which will require

flexibility to change as time moves ahead. e.g. diesel vehicles are more air polluting than petrol vehicles but produce less CO2 than petrol vehicles

488: Standard Assessment Procedure (SAP) already provides the robust calculation methodology

540: Technical calculations are best done through the Building Warrant process. Respondent notes there are two processes trying to achieve the same thing, and they aren't always aligned very well. It is appropriate to expect an energy statement to be submitted with a planning application, to demonstrate measures taken through the design process to seek the most efficient outcome, such as water efficiency measures, use of LZCGTs where appropriate etc., but this should not be confused with the Building Warrant process. Calculations should therefore not form part of the planning process.

591: Water efficiency measures are more appropriately controlled through Building Regulations.

610: Requirements of Policy R7 are too onerous. Many aspects would be more appropriately addressed through Building Standards. Fabric first approach should be adopted for technologies – often costly and unproven which affects viability.

### **Q23 Solar Farm Developments**

3, 20, 271, 366, 367, 422, 445, 451, 469, 485, 544, 549, 554, 560, 562, 563, 574, 599, 633: Agree with approach

544: support as a way of achieving energy targets.

549: these are an important 'clean' energy source.

451: Solar farms should be supported but not if it leads to the loss of productive farm land.

138: Respondent supports solar farms preferably in brownfield sites rather than in areas of landscape value. They note the possibility of farm animals being grazed within solar farms and they can double as sites for food production. Respondent recommends vertical farms that use solar energy for food growing be considered and notes that imagination is necessary given the pressing environmental challenges ahead.

456: Agree, with caution. Future climate may be more amenable to increasing wind power generation.

284: Encourage solar farms but not paid for by Council Tax.

318: Domestic solar is acceptable, large scale solar farms need to be part of a national initiative.

361: Investment into solar energy would be successful if it is subsidised, particularly domestic and community schemes. Reference to requirements in recent CIBSE journal.

599: Policy should direct developers towards the best funding opportunities at the time (solar, wind, heat pumps, other yet unknown technologies).

422: SNH guidance on natural heritage consideration in relation to solar farms may be beneficial. 574: All new properties should be fitted with solar panels. Recommends assessing the requirement for a policy on use of heat pumps as an additional point.

291, 542: Do not support.

542: It needs to be proven they are economic without subsidy.

### **Main Issue 7: Heat Networks**

284: General support for a policy approach.

318: Difficult to impose retrospectively, supports in new development.

486: Supporting heat networks within the City could strengthen support to redevelop the South Harbour. Future connections from port-related development to the NESS Energy From Waste site. Aberdeen Harbour Board is not in a position to provide and deliver heat network pipelines nor connections but they could liaise with ACC / heat providers to ascertain how future strategies could be implemented.

291: Do not agree with a policy approach

#### *Option 1 – Current Approach*

318, 451, 488, 540, 542, 565, 591: Supports current approach.

451: Heat network can provide useful benefits in terms of energy efficiency, but can tie people into a monopoly. A means to oversee and control the cost of energy is need, before any new policy is introduced.

488: No policy included within the appendix. Do not support the inclusion of a policy without appropriate research and evidence. As new homes become more energy efficient, the business case for heat networks becomes obsolete. The Scottish Government is currently developing a national approach to the development of Local Heat and Energy Efficiency Strategies (LHEES) which will set out an approach to decarbonising heat energy.

540: Heat networks can be positive, but evidence shows that viability for residential development is questionable. It would be valuable for the LDP to include information about existing heat networks and encourage their use, but this should not form part of a policy requirement. Recent consultation responses from SEPA have demanded developers demonstrate why they are not using a heat network, this position would be concerning if supported by planning policy, as viability can be impacted directly by a policy that might not be the best solution for a site.

542: If economic on an unsubsidised basis.



565: Further research and evidence is required into viability of heat networks. Generally supports a more coherent approach for heat networks.

591: Will allow appropriate network to come forward when they are considered viable. No policy listed in appendix. No detail on areas to be identified, criteria for sites to provide/connect, funding and maintenance.

### *Option 2 – Preferred Option*

591, 610: Objects to preferred option.

610: Lack of wording and clarity

9, 18, 271, 361, 366, 367, 422, 445, 456, 544, 549, 560, 562, 563, 574: Support preferred option.

9, 633: Identify existing keys areas and future areas for development where existing/potential heat sources are identified (Energy from Waste plant). Produce a coloured coded map to show the areas in the city that would facilitate easy access to the networks currently installed. This could be coded to show the suitability for connection across all city areas on a connection cost and development basis.

9: AHP would be happy to provide such a drawing to help facilitate this process and to provide a strategic approach for city coverage. No policy in Appendix 1 of the Main Issues Report.

633: Supports wording that enables development to be future proofed for future heat networks.

361: Heat pumps are not practical in a city environment; heat networks are preferable.

422: Would allow greater scope for the development of a coherent heat network plan across the city.

445: Is sustainable and achievable.

599: Brilliant idea in compact cities, will keep heat affordable.

### *Option 3 – Alternative Option*

22, 138, 469, 552, 554, 574 : Support alternative option.

138: Supports the idea but notes that current practice is incompatible with steps to reduce emissions. New technologies such as heat pumps need to be considered as an alternative source of heat. Respondent advocates against burning materials that can be recycled in the Energy from Waste plant as emissions need to be minimised.

469: A large proportion of Aberdeen's CO2 emissions come from residential sources; it is currently unlikely to meet its current obligation under the climate change Act. To meet climate change head on, action must be taken now rather than waiting for the next round of planning.

574: if it required a viability statement by the developer to demonstrate support for a scheme.

591: Contrary to the aims of the local development plan if development was prevented from coming forward.

599: Could lead to inefficient use of funding. A requirement on developers to assess the best solutions for their sites would be useful.

### **Summary of response by planning authority:**

#### **General**

3: Energy Performance Certificates provide indicators of the energy efficiency of a property, including typical energy costs. These are not subject to assessment by planning.

9: The Main Issues Report 2019 is a one-off consultation document which will not be republished, therefore additional text is not being sought.

#### **Existing ALDP 2017 Policy**

95: Concern over the Pipeline Consultation Zone is noted. These Zones are shown on the Proposals Maps for the ALDP and are considered through the planning application process, as per Policy B6 – Pipelines, Major Hazards and Explosive Storage Sites. There is no requirements 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. At present there is no requirement to modify policy B6, as per the Reporters Report into the extant ALDP.

633: The Monitoring Statement released with the Main Issues Report and Climate Change Report 2017-2018 both discuss Policy R7 and are available online from the Council's website.

#### **Main Issue 6: Low and Zero Carbon Generating Technologies and Water Efficiency**

##### *Option 1 – Current Approach*

318, 366, 441, 477, 488, 540, 542, 565: Support for the current approach is noted.

318, 488, 540, 565, 591, 610: Comments regarding Building Standards are noted. Section 72 of the Climate Change (Scotland) Act 2009 is clear in its direction. All Local Development Plans 'must include policies...to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions... through the installation and operation of low and zero-carbon generating technologies'. Amendments to the Climate Change (Scotland) Act 2009 are proposed through the Climate Change (Emissions

Reduction Targets) (Scotland) Bill which completed Stage 2 of the Parliamentary Process on 25 June 2019. No amendments are sought to Section 72 of the Act. Paragraph 154 of Scottish Planning Policy states, 'The planning system should.... help to reduce emissions and energy use in new building'. This is fundamental in achieving outcome 2 of Scottish Planning Policy: a low carbon place.

565: The platinum rating only relates to water efficient and energy within the Buildings Standards Sustainability Label. Our policies are related to our local environment, the same will be true for other local authorities. For example, water abstraction from the River Dee is pertinent to Aberdeen City and Aberdeenshire Councils, but not others.

477, 591: There is a commitment from the Scottish Government to upgrade existing housing stock, evidenced by the grants provided by Home Energy Efficiency Programme Scotland and Principle 9 of the Housing to 2040: A vision for our future home and communities (draft document), more locally a number of scheme are available: Aberdeen Affordable Warmth Scheme, Aberdeen Victorian Tenements Projects, ACE retrofitting, Warmer Homes Aberdeen.

540, 591, 610: Support for fabric first approach noted. The provisions of Section 72 of the Climate Change (Scotland) Act 2009 is clear regarding the expectations of local development plans.

591: Agree paragraph 158 of Scottish Planning Policy notes local development plans should use heating mapping to identify potential areas for co-locating developments of high heat demand with sources of heat supply, and support for heat networks. Heat networks are discussed within the Main Issues Report as Main Issue 7.

477: We agree a phased approach to carbon dioxide reduction is pragmatic and has been used.

542: The global situation regarding carbon dioxide emissions is noted however Scottish legislation, the Climate Change (Scotland) Act 2009 includes emission targets. This is currently being updated with more stringent targets.

### *Option 2 Preferred Option*

18, 22, 271, 361, 367, 422, 456, 472, 544, 549, 554, 560, 562, 563, 574, 599: Support for the preferred option is noted.

422, 549, 544: Relationship of the preferred option and the aims of the climate change act, and public health are noted.

574: The Scottish Government, through the National Renewables Infrastructure Plan and National Planning Framework 3 is committed to renewable energy generation including onshore and offshore windfarms, hydro electricity from rivers and tidal flows, wave power, heat networks and carbon capture. The Aberdeen City and Aberdeenshire Strategic Development Plan outlined may of the projects at a regional level.

### *Option 3 – Alternative Option*

138, 445, 451, 469, 522: Support for the alternative option is noted.

138: Aberdeen is committed to meet international obligations. Renewable energy generation is supported at a local and regional level, evidenced by the offshore wind turbines, the existing heat networks and the proposal to increase heat networks through the completion and implementation of the energy from waste plant. With regard to lighting of commercial premises at night, this is a choice for the individual commercial business owner.

445: Note comment regarding strongest action is required.

451, 469: Policies within the ALDP seek the retention of granite buildings. There is a commitment from the Scottish Government to upgrade existing housing stock, evidenced by the grants provided by Home Energy Efficiency Programme Scotland and Principle 9 of the Housing to 2040: A vision for our future home and communities (draft document), more locally a number of scheme are available: Aberdeen Affordable Warmth Scheme, Aberdeen Victorian Tenements Projects, ACE retrofitting, Warmer Homes Aberdeen.

### **Q22 Low and Zero Carbon Generating Technologies, and Water Efficiency**

138: The Low and Zero Carbon Generating Technologies, and Water Efficiency relates to new buildings. Emission from the oil and gas sector and the Aberdeen Western Peripheral Route are subject to other regulations.

284: The link between trees and reducing carbon dioxide levels is noted.

291, 318, 361, 367, 451, 574: Comments related to using a recognised standard and/or expert are noted.

445, 456: The comments relating to the complexity of the calculation and 'future proofing' are noted.

488: The comment on Standard Assessment Procedure (SAP) is noted.

591: Water efficiency is required through the current Strategic Development Plan. This is retained within the Proposed Strategic Development Plan. Therefore, the ALDP is required to contain a policy on water efficiency.

610: Support for fabric first approach noted. The provisions of Section 72 of the Climate Change (Scotland) Act 2009 is clear regarding the expectations of local development plans. All Local Development Plans 'must include policies...to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions... through the installation and operation of low and zero-carbon generating technologies'.

### **Q23 Solar Farm Developments**

3, 20, 271, 366, 367, 422, 445, 451, 469, 485, 544, 549, 554, 560, 562, 563, 574, 599, 633: Support for the approach is noted.

544, 549: Comments relating to energy targets and clean energy are noted.

138, 451: Comments relating to location of solar farms, and multi-use including animal grazing and vertical farming are noted.

456: Wind generating technology is supported in principle within the existing ALDP.

284: Council Tax contributes towards local services such as social care, schools, rubbish collections etc.

318: The Scottish Government is committed to ensuring Scotland is a low carbon place, as is evidenced by the Climate Change (Scotland) Act 2009, National Planning Framework 3 and Scottish Planning Policy. Renewable technology is paramount to achieving this goal.

361, 599: The ALDP cannot provide financial support to schemes but can support the principle of development. Due to the longevity of the ALDP, it is possible that funding sources noted in the ALDP may have expired.

422: The Scottish Natural Heritage Guidance is noted.

574: The use of domestic solar panels and heat pumps needs to be considered in terms of context. Scottish Government promotes a larger scale, national / community response to generating heat and electricity as is shown by National Planning Framework 3, Scottish Planning Policy and National Renewables Infrastructure Plan.

291, 542: Comments that do not support the approach are noted.

542: Comment relating to economics and subsidies of solar farms are noted. Aberdeen City Council is not the body responsible for providing subsidies for solar farms. Aberdeen City Council can outline development parameters for such projects.

### **Main Issue 7: Heat Networks**

284: The general support for a policy approach is noted.

318: Comments relating to retrospective works are noted, as is the support for new development.

486: Possible heat connections between the Energy from Waste Plant and the South Harbour are noted.

291: Comment that does not support the approach is noted.

*Option 1 – Current Approach*

318, 451, 488, 540, 542, 565, 591: Support for the current approach is noted.

451: The connections between energy efficiently and heat networks are noted. The cost of energy is not a material consideration within in planning system. Heat networks are an alternative way to supply heat to premises. Scottish Planning Policy (paragraph 159) states, 'Local Development Plans should support the development of heat networks in as many locations as possible'.

488: The policy should have been included within the appendix. This was as unfortunate drafting error. Scottish Planning Policy (paragraph 159) states, 'Local Development Plans should support the development of heat networks in as many locations as possible, even where they are initially reliant on carbon-based fuels if there is potential to convert them to run on renewable or low carbon sources of heat in the future'.

540: Paragraph 159 of Scottish Planning Policy identifies local development plans should include policies to support the implementation of heat networks. Paragraph 160 of Scottish Planning Policies suggests possible solutions where heat networks are not viable.

542: The ALDP does not provide funding. It outlines the principles of acceptable development. Any heat network policy would outline the parameters where heat networks are expected.

565: Support for a coherent approach is noted. The Scottish Government is committed to ensuing Scotland is a low carbon place, as is evidenced by the Climate Change (Scotland) Act 2009, National Planning Framework 3 and Scottish Planning Policy. Renewable technology is paramount to achieving this goal. Scotland's Heat Map is available from the Scottish Government website.

591: The policy should have been included within the appendix. This was as unfortunate drafting error with the Main Issues Report. Scottish Planning Policy paragraph 159 states, 'Local development plans should identify where heat networks, heat storage and energy centres exist or would be appropriate'. Further detail on this may be appropriate documents associated with the local development ALDP. Scotland Heat Map is available online at present.

### *Option 2 – Preferred Option*

9, 18, 271, 361, 366, 367, 422, 445, 456, 544, 549, 560, 562, 563, 574: Support for the preferred option is noted.

591, 610: Objections to the preferred option are noted.

610: The policy should have been included within the appendix. This was as unfortunate drafting error within the Main Issues Report.

9, 633: Scottish Planning Policy paragraph 159 states, 'Local development plans should identify where heat networks, heat storage and energy centres exist or would be

appropriate'. The suggested approach may be a reasonable way forward. Further detail on this may be appropriate documents associated with the ALDP.

9: The support from Aberdeen Heat and Power is noted and welcomed. The policy should have been included within the appendix. This was an unfortunate drafting error within the Main Issues Report.

633: The comment regarding future proofing is noted. Scottish Planning Policy paragraph 159 notes heat networks have the potential to be reliant on carbon based fuels initially, with the potential to convert them to run on renewables or low carbon sources in the future. Policy 159 also states policies should support safeguarding of pipework within developments for later connections and pipework to the curtilage of developments.

361, 422, 445, 599: Supporting statements are noted and welcomed.

### *Option 3 – Alternative Option*

22, 138, 469, 552, 554, 574: Support for the alternative option are noted.

138: The Scottish Government promotes heat and energy generation from renewables sources, at both an individual scale and a community scale. Heat pumps may be suitable for individual premises. The working practice of the Energy from Waste Plant is not considered through the ALDP.

469: The current ALDP contains policies on low and zero carbon generating technology. The Scottish Government, Aberdeen City Council and other organisations provide advice and funding opportunities to improve energy efficiency in existing homes.

574: Comments relating to the provision of a development viability statement are noted.

591: Comments highlighting the implications constraining development coming forward are noted.

599: Comments relating to inefficient use of funding are noted. The ALDP is not able to consider funding; the primary function of the ALDP relates to land use. Under Option 2 developers would be able to assess the best solution for their sites.

### **Planning authority action/recommendation for Proposed Plan**

Introduce new policy on Heat Networks.

<b>Issue 15</b>	<b>Business and Industry</b>
<b>Section of the MIR to which the issue relates:</b>	Section 6.3 Supporting Business and Industrial Development
<b>Planning authority's summary of the comment(s):</b>	
<b><u>Business and Industrial Development</u></b>	
<p>018, 138, 271, 291, 318, 361, 366, 367, 445, 456, 480, 542, 549, 565, 574, 599: Agree with current policy approach.</p> <p>018, 138, 271, 291, 318, 361, 366, 367, 445, 456, 480, 542, 549, 565, 574, 599: Agreement is welcomed and noted.</p> <p>421, 533: Flexibility is required to allow ancillary and supporting uses.</p> <p>533: Policy B1 and B2 are restrictive. Use of terms 'may be permitted' and the requirement that such facilities should be aimed "primarily" at meeting the needs of business and employees within the business and industrial area are ambiguous.</p> <p>318, 565: Areas should be considered on a case-by-case basis.</p> <p>471: Commercial development should be located in mixed-use neighbourhoods.</p> <p>554, 560: Depends on locations and viability.</p> <p>451: Land could be reused for housing provided residential criteria are met.</p> <p>560: Depends on economic context, might be better for another use.</p> <p>533: Supporting text to Policy B1 and B2 should provide examples of permissible uses within B1 and B2 area such as Class 1, 2, 3, 10 and 11.</p>	
<b><u>Policy B3 – Aberdeen International Airport and Perwinnes Radar</u></b>	
<p>549: Environmental costs of flying should be explicitly stated.</p>	
<b><u>Aberdeen Harbour</u></b>	
<p>486: Protect business and industrial uses within Aberdeen Harbour to ensure harbour-related operations are not compromised. South Harbour – market demand for operational facilities is greater than originally anticipated. North Harbour – inner core to retain operational uses. Flexibility to accommodate complementary development opportunities should be considered within the LDP 2022.</p>	



### **Policy B6: Pipelines, Major Hazards and Explosive Storage Sites**

095. Supports identification of consultation zones within proposals maps and the associated descriptions. Retain policy and text in paragraph 3.74.

#### **Summary of response by planning authority:**

#### **Business and Industrial Development**

421, 533: Existing policy B1 provides sufficient flexibility to allow uses in addition to Classes 4, 5 and 6 to be treated on their own merits, and to be accommodated in business/industrial areas where appropriate.

318, 565, 451, 471, 554, 560: The Local Development Plan review process includes consideration of existing business and industrial allocations and whether they are still fit for purpose. Where a development proposal is submitted, this is usually determined on a case-by-case basis. The Strategic Development Plan (SDP) requires the Local Development Plan to maintain a ready supply of employment land in the right places. The Proposed Aberdeen Local Development Plan (ALDP) intends to maintain this supply. The Proposed ALDP zones land for mixed uses where both commercial and other uses are appropriate. Policies B1 and B2 relate to land zoned specifically for employment uses. The Proposed ALDP zones land for other uses such as residential or retail. Proposals for non-business/industrial uses would be more appropriate on such areas.

533: Supporting text in the Business and Industrial Development Section of the Plan comprises examples of supporting facilities that make an important contribution to employment areas. It is intended to carry this approach forward in the Proposed ALDP.

#### **Policy B3 – Aberdeen International Airport and Perwinnes Radar**

549: Policy B3 – Aberdeen International Airport and Perwinnes Radar safeguards land surrounding the airport for airport-related uses and ensures that development across the City does not compromise the safety of airport operations or associated radars. The Proposed ALDP does not promote the airport or flying over other more sustainable transport methods.

#### **Aberdeen Harbour**

486: The Proposed ALDP will continue to safeguard business and industrial uses within the land zoned for the Aberdeen Harbour Expansion Project. Existing policy B5 provides sufficient flexibility to allow additional uses to be treated on their own merits and to be accommodated within the areas surrounding the harbour where appropriate.

### **Policy B6: Pipelines, Major Hazards and Explosive Storage Sites**

095: Support is noted. Policy B5 – Pipelines, Major Hazards and Explosive Storage Sites has been taken forward into the Proposed ALDP.

**Planning authority action/recommendation for Proposed Plan**

**Actions and Recommendations for Proposed Plan**

Carry forward existing business, harbour and pipelines policies to the Proposed Plan.

<b>Issue 16</b>	<b>West End Office Area</b>
<b>Section of the MIR to which the issue relates:</b>	Main Issue 8 – West End Office Area
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Preferred option</b></p> <p>003, 018, 020, 138, 271, 361, 366, 367, 445, 451, 456, 472, 542, 544, 549, 552, 554, 560, 563, 565, 574, 591, 599, 610: Support preferred approach.</p> <p>318, 472, 554, 591: Preferred option will promote use of vacant buildings.</p> <p>549, 565, 591: Preferred option will stimulate investment and promote vibrancy.</p> <p>565: There should be a pragmatic approach to design.</p> <p>366: The West End should not be considered as different to the city centre.</p> <p>020: Supports arts and museums in the area.</p> <p>456: Good area for incorporating and growing artistic culture businesses and schools.</p> <p>284: No new development.</p> <p>552: Consider specifying quality grading of hotels and hostels.</p> <p><b>Support for Option 1</b></p> <p>291, 318: Support Option 1.</p> <p>451: Unsure if market can accommodate more hotels.</p> <p>623: Objects to mixed uses and notes road safety and traffic impacts from current hotel uses.</p> <p><b>Support for Option 3</b></p> <p>361, 471, 623: Supports Option 3 – residential use.</p> <p>542: Residential development should be supported where viable but not to the exclusion of office development.</p> <p>544: Significant residential development will have impact on health care provision in the area.</p>	

## **Summary of response by planning authority:**

### **Preferred Option**

003, 018, 020, 138, 271, 361, 366, 367, 445, 451, 456, 472, 542, 544, 549, 552, 554, 560, 563, 565, 574, 591, 599, 610, 318: Support for the preferred option is welcomed and noted. There has been an increase in vacancies of office space in the West End as a result of new Grade A office developments in the city centre together with the recent downturn in the oil and gas industry. It is felt that a greater mix of uses will promote the reuse of vacant buildings and will promote vibrancy and vitality in the area.

565: The Council recognises that the West End is part of the Albyn Place/Rubislaw Conservation Area. All proposals will be expected to protect the amenity of existing uses and respect the special historic and architectural character of the area.

366: The city centre plays a major role in the commercial, economic, social, civic and cultural life of Aberdeen and the wider North East. It is an important regional centre providing a focus for employment and business attraction, as well as providing a place where people can shop, meet socially, live or visit. The West End area on the other hand is located at the edge of the city centre. This area is considered separate from the city centre, offering a mix of uses that create a unique urban quarter with a distinct character.

020, 456: The preferred option would support a variety of uses in the area including business uses. Any proposals that come forward would be assessed according to their merit as part of the planning application process.

284: The vision of the Proposed ALDP is for Aberdeen to be a sustainable city where people want to live, visit and do business. The West End Area comprises existing buildings, some of which are vacant. The preferred approach encourages the reuse of these buildings for a variety of uses. The reuse of vacant buildings will enable this part of the city to be vibrant and will support the overall sustainable economic growth of the city.

552: The Proposed ALDP provides a land use framework for the city of Aberdeen. It cannot dictate the grading of hotels and hostels, nor does it intend to do so.

### **Support for Option 1**

291, 451, 623: Support for option 1 noted. The preferred option does not promote hotels over other uses but rather it encourages a variety of uses to add to what is currently in place. Any proposals that come forward will be assessed according to their merit. There are policies in place that deal with the transport impacts of development – these would have been applied in the assessment of applications for current hotel uses.

### **Support for Option 3**

471, 623, 361, 542, 544: Support for option 3 noted. The preferred option is supportive of both residential and office uses. Where proposals for residential use are submitted, the precise level of infrastructure requirements including health care provision will be assessed as part of the planning application process.

<b>Planning authority action/recommendation for Proposed Plan</b>
Encourage the West End Area as a focus for a mix of uses including residential.

<b>Issue 17</b>	<b>Affordable Housing</b>
<b>Section of the MIR to which the issue relates:</b>	Section 7 Affordable Housing
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Threshold of 5 or more</b></p> <p>003, 361, 367, 456, 488, 554, 560, 563: Agrees</p> <p>318: Proposals for less than five units may struggle in viability terms</p> <p>366, 549: Threshold should not exist – all units should be affordable</p> <p>390, 472: Affordable housing should always be provided</p> <p>473: Raise the threshold to bring forward more sites and allow smaller developers to compete</p> <p><b>Continuing Current Approach into LDP 2022</b></p> <p>005: A fresh approach is needed; delivery of these units is important. Front-load the delivery requirement to reduce risk of commuted payments or non-completion</p> <p>018, 271, 361, 367, 456, 488, 544, 562, 563, 565, 591: Agree</p> <p>471: Affordable housing should be provided on-site – off-site or commuted payments should not be allowed or make it uneconomic for this to be an option (i.e. offer incentive for on-site delivery). Affordable housing should be a mix of sizes for private purchase, not just Housing Associations.</p> <p><b>Affordable Housing Requirement</b></p> <p>138: 25% requirement for affordable housing is too weak, especially in larger developments</p> <p><b>Affordable Housing Delivery</b></p> <p>479: Should be located in areas with good public transport. Does not make sense to include affordable units in all developments, especially those on the edge of the city with poor public transport links.</p> <p>540: Development industry is committed to delivery of affordable homes, however if mainstream delivery is lacking then so will affordable. The LDP should have a focus on delivery rather than a reliance on very large sites that consistently, under-deliver.</p>	

557: Welcomes proactive approach to deliver 2000 homes. Suggests that sites for affordable housing should be identified. Identifies a crucial need for affordable home sin Deeside area – supports allocation of land at Tillyoch for affordable and accessible housing in Peterculter.

565: Could be some flexibility in delivery of affordable housing.

### **General Affordable Housing Comments**

574: 599: Ensure 25% is adhered to rather than allow negotiation of lower figures. Suggests giving support to development that offers higher levels of affordable housing units on site.

591: Wording should be amended to reflect SPP more closely – not enough flexibility for a reduction. Approach currently relies too heavily on the delivery of mainstream housing. Remove the hierarchy of delivery and replace with support of delivery across all mechanisms. Identify and allocate sites for affordable housing (Planning Advice Note 2/2010) along with preferred method of delivery as an alternative to 25% blanket. Supplementary Guidance refers to submarkets. Reference to submarkets should be removed, it contravenes SPP and SDP, distorts the market, hinders the delivery of affordable housing. There should be a consistent approach applied throughout the Aberdeen Housing Market Area.

599: Affordable housing should be aligned with incomes and not market prices of properties.

610: Agrees with the 25% benchmark. Policy wording should be more flexible. Too much reliance on developer to provide land for development – off-site provision should be just as acceptable – focus should be on delivering housing where it is needed. Reference to PAN 2/2010, sub-market areas within supplementary guidance is unacceptable. Commuted payments are described as excessive and often in excess of plot value.

### **Other Comments**

002: Private landlords buying multiple properties affects the housing market. Council should impose tax on such individuals

003: Build more Council houses

020: Insist that developers meet affordable housing obligations

284: Stop building houses. Affordable housing is not really affordable. Direct development to unused units.

291: Build housing on greenfield land and provide easy and cheap access

445: "Affordable housing" is a misnomer. The actual cost is driven by developers.

451: Fully supports a drive toward an increase in social and affordable housing

542: Queries statistics on house prices in Aberdeen being higher than the Scottish average. Recommends that in order to provide affordable housing, the Council should buy the inner city stock which is cheaper than new builds.

544: Believes affordability of housing is an important determinant of health.

### **Question 26: Build to Rent**

002: Private landlords buying multiple properties affects the housing market. Council should impose tax on such individuals.

284: Don't build any more houses

366: No new private rental new builds. All rented units should be affordable

473: Rising costs are driving out private landlords, no economic benefit in investors building to rent unless reversed. This will have a negative impact on the Council as waiting lists will do up.

542: Do nothing – the surplus in properties as a result of the oil downturn should be allowed to dissipate before action is taken.

### **Build to Rent – General Support**

560, 563: Support – general

367: Support Build for Sale as an alternative

368: Yes, in large developments allocate a percentage for rental.

445: Yes. Ensure that potential clients are made fully aware of all costs they will incur. Families have sometimes been unable to meet the monthly management costs.

471: Private landlords should be encouraged as well as build to rent.

456: Depending on the location, encourage developers to provide build to rent in their build to sell development. These could perhaps be separately, elsewhere. Implement a policy that bars short-term Airbnb style rents.

### **Build to Rent - Does not Support**

291: Not required.

318: Should not be a Council priority. Many houses for sale in Aberdeen.

479: Does not support

574: Suggests there is no need for Build to Rent (over 1000 properties to rent in Aberdeen in Q2 of 2019)



361: Prefers existing process

### **General Build to Rent Comments**

488: Refers to Chief Planner's Planning Delivery Advice on Build to Rent explaining housing typology, encourage a flexible approach to design standards and developer contributions more reflective of this tenure. Local authorities to consider the opportunities to provide affordable housing contributions under the management of a single, professional landlord within an undifferentiated service, tenure-blind development model.

554: Perhaps, but limited

599: Would only support policy if rent can be controlled

037: Believes this to be an important issue but is unsure how Local Development Plan could deliver

020: Local Development Plan would have to ensure the provision of properties with affordable rent

### **Summary of response by planning authority:**

#### **Threshold of 5 or more**

003, 361, 367, 456, 488, 554, 560, 563: We note the respondents agree that the threshold for affordable housing contributions in new developments should remain (proposals for 5 units or more).

318: We note the respondent suggests there may be viability implications if the threshold for affordable housing requirements is lowered. The threshold is not set to change from current requirements.

366, 549: Respondents note that all units should be affordable and that the threshold (proposals for 5 units or more) should not exist. Whilst we encourage the delivery of a range of house types and tenures on all housing developments – and particularly the delivery of affordable homes – we acknowledge that affordable housing requirements are not always viable for the applicant. Affordable housing requirements are set out in Planning Advice Note 2/2010 and Scottish Planning Policy, which form the basis of the Proposed ALDP's policy and guidance. Where possible, applicants may choose to exceed the Council's 25% affordable housing requirement.

390, 472: Respondents note that affordable housing should always be provided. Affordable housing is presently a policy requirement of proposals of five or more housing units. The rate of affordable housing is 25% of all units and this can be delivered in different ways. There is no intention to alter this policy moving forward into the Proposed ALDP. Whilst we encourage the delivery of a range of house types and tenures on all housing developments – and particularly the delivery of affordable homes – we acknowledge that affordable housing requirements are not always viable for the applicant. Affordable housing

requirements are set out in Planning Advice Note 2/2010 and Scottish Planning Policy, which form the basis of the ALDP's policy and guidance.

473: Respondent suggests the threshold should be raised to support development viability. Affordable housing requirements are set out in Planning Advice Note 2/2010 and Scottish Planning Policy, which form the basis of the ALDP's policy and guidance. Whilst we encourage the delivery of a range of house types and tenures on all housing developments – and particularly the delivery of affordable homes. Applications are assessed on their own merits and we acknowledge that affordable housing requirements are not always viable for the applicant.

### **Continuing Current Approach into LDP 2022**

005: Respondent believes a fresh approach to affordable housing delivery is needed and that these units should be front-loaded to reduce the risk of non-delivery. Planning applications are assessed on their own merits and affordable housing units are a policy requirement, often agreed by way of planning condition(s) or by legal agreement to ensure delivery. Some proposals may agree off-site contributions or commuted payment if appropriate, however the policy preference is on-site delivery. There is no intention to change this policy position.

018, 271, 361, 367, 456, 488, 544, 562, 563, 565, 591: Respondents support in favour of continuing the current approach into the Proposed ALDP is noted.

471: Respondent does not support off-site affordable housing contributions or commuted payments and notes that affordable housing units should not just be Housing Associations. Planning applications are assessed on their own merits and affordable housing units are a policy requirement, often agreed by way of planning condition(s) or by legal agreement. Some proposals may agree off-site contributions or commuted payment if this is appropriate, however the policy preference is on-site delivery. There is no intention to change this policy position. Affordable housing represents a range of different types and tenures of housing; such as social rented, shared ownership/ shared equity, Low Cost Home Ownership, Low Cost Entry Level, and mid-market rented accommodation. These are not supplied solely by Housing Associations.

### **Affordable Housing Requirement**

138: Respondent notes that 25% requirement for affordable housing is not enough, particularly in larger developments. Our policy requirements have been set out in line with Planning Advice Note 2/2010 and Scottish Planning Policy. There is a presumption of 'no more than 25%', so we presently adopt the highest possible position to try and address the shortage of affordable homes in the area (as identified in the Housing Need and Demand Assessment 2017). Some sites do come forward as 100% affordable housing developments, and similarly, these would be supported if they comply with all other relevant policies.

### **Affordable Housing Delivery**

479: Respondent makes suggestions regarding the location of affordable housing units. We agree that design and placemaking is a key component of the planning process. Planning applications are assessed on their own circumstances, including proposal and site context, so this would be considered during the development management process.

540: Respondent notes that where the delivery of housing development is lacking, so will the delivery of affordable housing – therefore a focus on delivery is key. The Proposed ALDP identifies a range of potential housing sites for development based on sustainable development and growth, in line with targets set by the Strategic Development Plan. These vary in size and location, both greenfield and brownfield.

557: Respondent supports a proactive approach to housing delivery and supports the allocation of land at Tillyoch for development. Our policy requirements have been set out in line with Planning Advice Note 2/2010 and Scottish Planning Policy. There is a presumption of ‘no more than 25%’ contribution for affordable housing, so we presently adopt the highest possible position to try and address the shortage of affordable homes in the area (as identified in the Housing Need and Demand Assessment 2017). The development bid at Tillyoch which was submitted as a new bid during the Main Issues Report has been assessed and is not recommended for allocation in the Proposed ALDP.

565: Respondent supports flexibility on the delivery of affordable housing. The context of the respondent’s comment is not clear. However, affordable housing represents a range of different types and tenures of housing; such as social rented, shared ownership/ shared equity, Low Cost Home Ownership, Low Cost Entry Level, and mid-market rented accommodation. Planning applications are assessed on their own merits and affordable housing units are a policy requirement, often agreed by way of planning condition(s) or by legal agreement. Some proposals may agree off-site contributions or commuted payment if appropriate, however the policy preference is on-site delivery. There is no intention to change this policy position in the Proposed ALDP.

### **General Affordable Housing Comments**

574: 599: Respondent recommends that affordable housing levels should not be subject to negotiation and that support should be given to proposals that offer higher levels. Applications are assessed on their own merits and we acknowledge that affordable housing requirements are not always viable for the applicant, however we would seek alternative developer contributions wherever possible in lieu of contributions (i.e. commuted payments). Some sites do come forward as 100% affordable housing developments, and similarly, these would be supported if they comply with all other relevant policies.

591: Respondent advises more flexibility on the delivery of affordable housing is needed. Our policy requirements have been set out in line with Planning Advice Note 2/2010 and Scottish Planning Policy. There is a presumption of ‘no more than 25%’ affordable housing contribution, so we presently adopt the highest possible position to try and address the shortage of affordable homes in the area (as identified in the Housing Need and Demand Assessment 2017). Affordable housing represents a range of different types and tenures of housing; such as social rented, shared ownership/ shared equity, Low Cost Home Ownership, Low Cost Entry Level, and mid-market rented accommodation. Planning

applications are assessed on their own merits and affordable housing units are a policy requirement, often agreed by way of planning condition(s) or by legal agreement to ensure delivery. Some proposals may agree off-site contributions or commuted payment if appropriate, however the Council's policy preference is on-site delivery. There is no intention to change this policy position in the Proposed ALDP.

599: Respondent suggests the affordability of affordable housing is reviewed. In Scottish Planning Policy, affordable housing is defined as 'Housing of a reasonable quality that is affordable to people on modest incomes'. This allows affordable housing to be flexible a Local Authority's own circumstances. Our policy requirements have been set out in line with Planning Advice Note 2/2010 and Scottish Planning Policy. There is a presumption of 'no more than 25%' affordable housing contribution, so we presently adopt the highest possible position to try and address the shortage of affordable homes in the area (as identified in the Housing Need and Demand Assessment 2017). Affordable housing represents a range of different types and tenures of housing; such as social rented, shared ownership/ shared equity, Low Cost Home Ownership, Low Cost Entry Level, and mid-market rented accommodation.

610: Respondent advises more flexibility on the delivery of affordable housing is needed. Our policy requirements have been set out in line with Planning Advice Note 2/2010 and Scottish Planning Policy. Planning applications are assessed on their own merits and affordable housing units are a policy requirement, often agreed by way of planning condition(s) or by legal agreement to ensure delivery. Some proposals may agree off-site contributions or commuted payment if appropriate, however the Council's policy preference is on-site delivery. There is no intention to change this policy position in the Proposed ALDP.

### **Other Comments**

002: Respondent notes issues with private landlords owning multiple properties. This is not a consideration of the Proposed ALDP. The extent of the Council's control over this is unknown.

003: Respondent suggests the delivery of more Council houses. The delivery of homes is dependent upon several factors; however, the Proposed ALDP will support the right development in the right place, in line with Scottish Planning Policy. The Local Housing Strategy is prepared by Aberdeen City Council and is the sole strategic document for housing at local level and sets out the strategy, priorities and plans for housing delivery, investment and related services. The Strategic Housing Investment Plan (SHIP) sets out strategic investment priorities for a five year period to achieve the outcomes identified in the Local Housing Strategy. Local Authorities are required to submit its SHIP to the Scottish Government annually.

020: The respondent suggests the Council insist developers meet their planning obligations. In line with planning legislation and Scottish Planning Policy, Developer Obligations are set out for certain development proposals and bound by a legal agreement. Circumstances may be subject to change, such as development viability, meaning obligations can alter as a result of alternative negotiations with the Council.

284: Respondent advises against building more homes and that affordable units are not affordable. Development should be directed to unused units. The Council's spatial strategy seeks to utilise brownfield sites as a priority, in line with Scottish Planning Policy and the Strategic Development Plan. There is a requirement set by the Strategic Development Plan to deliver housing supply, with various sites identified as suitable for development in the Plan. This means that new homes will continue to be built throughout the Plan period.

291: Respondent supports new housing development on greenfield land. The Council's spatial strategy seeks to utilise brownfield sites as a priority, in line with Scottish Planning Policy and the Strategic Development Plan. However, in order to maintain a range of housing sites, appropriate greenfield sites are also identified for development in the Proposed ALDP to allow sustainable growth of the City.

445: Respondent believes developers control cost of housing. Affordable housing represents a range of different types and tenures of housing; such as social rented, shared ownership/ shared equity, Low Cost Home Ownership, Low Cost Entry Level, and mid-market rented accommodation. In Scottish Planning Policy, affordable housing is defined as 'Housing of a reasonable quality that is affordable to people on modest incomes'. This allows affordable housing to be flexible a Local Authority's own circumstances.

451: Respondent's comments in support of social and affordable housing noted. We support sustainable mixed communities and providing homes for varying needs and demographics.

542: Respondent queries that Aberdeen house prices are higher than Scottish average and suggests that the Council should buy inner city housing stock. We acknowledge there are areas in Scotland that present higher property prices than Aberdeen City. The housing market in Aberdeen can be seen to fluctuate more than other areas in Scotland as a result of its unique local economy and property prices can rise and fall frequently. However, figures shown by Zoopla for the last 12 months show that the average value for homes in Aberdeen are £208,863 (an overall increase of £957) but were sold on average at £203,782. For Scotland the average value was £190,792 (an overall decrease of £7709), with the sold price was £182,353. Many properties in the 'inner city' cannot to be purchased or 'bought out' by the Local Authority due to cost and private ownership. Through other Main Issues, and other Council strategies, we are working towards improving the quality and choice of the housing stock in the City Centre.

544: Respondent notes that housing affordability is linked to health. We acknowledge that there should be an adequate supply of housing to suit all sections of our community; in terms of choice and affordability. This in turn will contribute to successful and sustainable mixed communities. The Proposed ALDP seeks to achieve this through the identification of a range of appropriate sites for future housing development and ensure affordable housing contributions are met.

### **Other General Comments**

002: Respondent comments on private landlords and suggests the Council should tax these individuals. The respondent's comments are noted however this is not within the remit of the Local Development Plan.

284: Respondent advises against the building of more houses. The Strategic Development Plan for the region sets the housing targets for Aberdeen City, which informs the Local Development Plan. The Council has a statutory duty to prepare a Local Development Plan and set targets for housing development. This is achieved through identifying a range of potential development sites around the City, both greenfield and brownfield.

366: Respondent supports no new private rental new builds, and all rented units should be affordable. Comments are noted. Affordable housing covers a wide range of tenures. Private rented properties are outwith the control of the Proposed ALDP, however we agree that there should continue to be a wide range of housing to support all sections of the community.

473: Respondent provides observations on challenges for private landlords in the current housing market. Comments are noted.

542: Respondent recommends that no action is taken to allow the downturn in the economy to dissipate. Comments are noted. It is the role of the Proposed ALDP to create and support sustainable mixed communities in the City, we must therefore continue to consider all options to encourage a greater variety of home in the local housing stock aside from the economic context.

### **Build to Rent – General Support**

560, 563, 367, 368, 445, 471: Comments in support of Build to Rent are noted. The topic has been raised at Main Issues Report stage in order to consult with various sections of the community as to if/ how this can be raised in the Proposed ALDP.

456: Respondent supports an element of Build to Rent in development site and supports a policy to restrict short-term lets (for example: Airbnb). Comments are noted. At present there is no legislative position to control holiday-type lets such as those cited. Emerging Planning legislation will allow further powers to control this, however this will not affect the Proposed ALDP under consideration.

### **Build to Rent - Does not Support**

298, 318, 479, 574, 361: Respondent believes Build to Rent is not required in Aberdeen. Comments are noted. The topic has been raised at Main Issues Report stage in order to consult with various sections of the community as to if/ how this can be raised in the Proposed ALDP.

### **General Build to Rent Comments**

488: Respondent provides general comments on design standards and Developer Obligations, recommending changes to how affordable housing is managed. Our policy is set out in line with the relevant planning guidance from national level. Comments are noted.

554: Respondent believes the Local Development Plan's role in Build to Rent is limited. Comments are noted.

599: Respondent would support policy if rent was controlled. Comments are noted.

037: Respondent notes that the issue is of importance but is unsure what the relevance is to the Proposed ALDP. Comment is noted. The topic has been raised at Main Issues Report stage in order to consult with various sections of the community as to if/ how this can be raised in the Proposed ALDP. The Proposed ALDP has not included a policy on Build to Rent at this time.

020: Respondent notes that the Proposed ALDP should ensure affordable rent. In Scottish Planning Policy, affordable housing is defined as 'Housing of a reasonable quality that is affordable to people on modest incomes'. This allows affordable housing to be flexible a Local Authority's own circumstances. Our policy requirements have been set out in line with Planning Advice Note 2/2010 and Scottish Planning Policy. 'Affordable housing' represents a range of different types and tenures of housing; such as social rented, shared ownership/ shared equity, Low Cost Home Ownership, Low Cost Entry Level, and mid-market rented accommodation. The Local Development Plan is unable to set rent levels for homes.

**Planning authority action/recommendation for Proposed Plan**

No significant changes proposed.

<b>Issue 18</b>	<b>Housing Mix</b>
<b>Section of the MIR to which the issue relates:</b>	Section 8.2 Housing Mix, Section 8.3 Residential Care Facilities and Section 8.4 Student Accommodation.
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Inclusive Housing Mix</b></p> <p><b>Option 1</b></p> <p>488: Supports current approach as prescribed mix in policy may impact on development viability. The market will dictate what will sell in a particular location, and at that time, and should not be prescribed by a policy. This duplicates Building Standards requirements.</p> <p>540: Supports the current approach. Notes that development is driven by 'build and sell' demand. Believes that market is restricted by the lack of effective housing allocations which constrains the mix.</p> <p>591, 610: Current approach allows flexibility in response to market and demand. Planning service can already negotiate housing mix; a prescriptive mix could affect viability. Lifetime living is supported in principle but is covered by Building Standards and duplication is not necessary</p> <p><b>Option 2</b></p> <p>018, 022, 271, 361, 367, 367, 549, 562: Preferred option</p> <p>445, 451: Build houses which can within reason be adapted for use by older people</p> <p>472: Supports a mix of housing in developments – 1 bedroom upwards</p> <p>544: Welcomes this as a main issue. Providing suitable housing for these patient groups will support their care needs.</p> <p>560: Work with key parties to find what could make development better for people with specific needs</p> <p><b>Option 3</b></p> <p>138: Lack of housing for the ageing population. Current housing mix policy not firm enough. A percentage requirement is needed for all new developments based on local need and demand.</p> <p>318: Supports Blaircara Village development bid</p>	



366: Smaller houses are better than blocks of flats. This would free up larger homes for families

471: Housing developments should be mixed (various sizes and uses for different age groups). Supports a policy to ensure developers consider their proposals as part of a neighbourhood and provide a healthy mix of housing.

574: Option 2 is insufficiently defined. Supports Option 3 with provision of further guidance.

599: Detailed guidance required. Policy needs to ensure pricing the intended occupants out of the market.

### **General Comments**

390: Discussions with the local community/ community council

020: Make it a condition of planning permission to ensure greater mix.

284: Convert empty buildings into OAP homes – no new development.

457: Different demographics are not compatible in housing mixes. Mixed housing is not logical.

479: Quality public transport should be provided in new developments and existing communities. Cancellation of council funded buses is isolating the elderly.

542: Does not support any of the LDP plans. Accommodation for senior citizens needs to be close to local amenities. Placing requirements on developers in the suburbs might not provide this.

557: The Council should identify appropriate location for sites and demand. Respondent supports development bid at Tillyoch.

565: Not supportive of Option 2. There needs to be flexibility to allow response to market needs. A policy requirement could be restrictive and become outdated.

### **Main Issue 10: Residential Care Facilities**

#### **Option 1**

549: The preferred option would lead to more 'Triple Kirks' scenarios.

549: It is unclear what the context of the respondent's comments are. Triple Kirks received planning permission and was constructed for student accommodation development; the applicant sought a later amendment to vary the mix of accommodation types within that development. The development is to comprise a mix of student accommodation and other residential accommodation.

#### **Option 2**

018, 271, 361, 367, 368, 451, 456, 562, 563: Support

445: No simple solution. Appropriate care homes need to be built to avoid bed blocking

472: Should be included within developments of a certain size. Sheltered units could be included and should be accessible to public transport and local amenities.

544: This is a societal priority with changing demographics. Supports the preferred option to raise the profile of care facilities.

574: New policy should be prepared in consultation with Health and Social Care partners.

599: Queries whether transport, design and amenity requirements would constrain development.

### **Option 3**

022, 366, 479: Support

318: Should be case by case

### **General Comment**

284: No new development

291: Council should fund

390: Discuss with relevant parties – Council/ NHS/ locals

457: More carers. Need to start recruiting now, provide tax relief

020: These are badly needed. Finance is required to pay better wages to staff.

526: Inclusion of policy is supported, but Opportunity Sites should be identified for such uses too

### **Main Issue 11: Student Accommodation**

#### **Option 1**

441, 560: Support

542: Policy H9 does not resolve the problem. Better communication with the universities to establish a need is required, and there should be support from them for new development.

#### **Option 2**

018, 022, 271, 367, 456, 472, 562, 563, 574, 554: Support

361: There is an oversupply of student accommodation – possible decline in student uptake

445: Saturation point will be reached, and ACC will need to monitor this closely

451: No merit in restricting student accommodation to H1 areas only. Access to public transport is important. Proximity to place of work is important but not at the expense of family accommodation. Recommends that education institutions should work together to forecast future demand and developments to be approved if there is identified need.

599: Supportive of a new policy. The key will be balancing the levels of requirements with the rentals which can realistically be expected from students.

### **Option 3**

368, 479: Support

318: Reduce costs to student by integrating with Residential Care Facilities as proposed by Blaircara Village development bid

366: Less student accommodation – there is an overprovision

### **General Comment**

003: Ensure students aren't required to drive, avoiding the need for cars. Accommodation affordable and close to University.

020: Use empty buildings on Union Street

037: Queries whether this is still a problem

284: Universities should provide this

489: Broadly supportive of a student accommodation policy. Notes that student accommodation should be accessible by public transport and supports relaxation of parking standards. Also supportive of the consideration of change of use of existing developments. Reference to developer obligations is repetitive of earlier policy.

## Summary of response by planning authority:

### Inclusive Housing Mix

#### Option 1

488: Respondent supports current approach to allow the market to dictate housing mix. We note the respondent's comments regarding development viability, however the Housing Need and Demand

Assessment (2017) has identified there is a need for housing designed to suit the needs of an ageing population which we must somehow address. This may include adaptable/ accessible homes, or more smaller units for downsizing.

540: Respondent supports the current approach and that the market is restricted by lack of housing sites. Development sites are assessed and allocated for development. These sites vary in size, location and are a mix of greenfield and brownfield land. Sites must also be appropriate for development when considering infrastructure provision, neighbouring uses and environmental protection. The Housing Land Audit (2019) found that there is a 7.2 year supply of housing land in the Aberdeen Housing Market Area, of which the statutory requirement is 5 years.

591, 610: We note the respondent's comments regarding development viability, however the Housing Need and Demand Assessment (2017) has identified there is a need for housing designed to suit the needs of an ageing population which we must somehow address. This may include adaptable/ accessible homes, or more smaller units for downsizing. We have amended the draft policy contained within the Proposed ALDP to support a broader mix of housetypes to meet local need.

#### Option 2

018, 022, 271, 361, 367, 367, 549, 562: Respondents selected the 'preferred option'

445, 451: Comments are noted. Building Standards in Scotland require a level of adaptability standards, which support this. The proposed policy seeks to support the Development Management process in agreeing more diverse housing mixes in new developments.

472: Comments are noted. We support sustainable mixed communities; especially when seeking more diverse housing mixes in new developments.

544: Comments are noted. We support sustainable mixed communities; especially when seeking more diverse housing mixes in new developments.

560: Comments are noted. We consult with a wide range of stakeholders throughout the plan-making process including internal services, Community Councils and local health bodies.

### **Option 3**

138: Comments in support of a policy for greater mix of house types are noted. In order to maintain suitable flexibility to accommodate development viability, we propose a policy that supports organic, sustainable mixed communities. We will encourage a mix of house types on development sites to allow the individual circumstances of proposals to be considered.

318: Support for the development bid B09/22 is noted. The assessment of this bid has been set out with this Report and the site is not supported for allocation in the Proposed ALDP.

366: Comments are noted. We support sustainable mixed communities and providing homes for the varying needs and demographics of the City.

471: Comments are noted. We support sustainable mixed communities and providing homes for the varying needs and demographics of the City.

574: Comments are noted. The Main Issues Report presents an initial position for consultation, we have developed this for the Proposed ALDP stage for further consultation. We propose expanding upon existing Policy H4 (Housing Mix), encouraging housing design to be accessible, or adaptable for future accessibility needs.

599: Comments are noted. The Main Issues Report presents an initial position for consultation, we have developed this for the Proposed ALDP stage for further consultation. Policy cannot offer control over house price, but we acknowledge this is an important point.

### **General Comments**

390: Comments are noted. We consult with a wide range of stakeholders throughout the plan-making process, Community Councils are included within this audience.

020: Comments are noted – at present, a mix is sought through existing policy, or the masterplanning process. We propose a more definitive stance to address local housing need for a changing demographic.

284: Comments are noted. The Local Development Plan supports the sustainable use of land and buildings; however, the Proposed ALDP has no control over vacant properties under private ownership.

457: Comments are noted. It is unclear whether the respondent's comments are reflective of the content within the Report. Housing Mix refers to the various housetypes and sizes across a development/ site.

479: We support sustainable and active travel. However, the issues raised within the comments cannot be addressed by the Proposed ALDP.

542: We support the principle of 'the right development in the right place', in line with Scottish Planning Policy. Planning applications will be assessed on their own merits, but we agree that proximity to amenities is a key factor for housing for an older population.

557: The Local Development Plan identifies land for potential development sites and encourages sustainable development in the City. To encourage organic, sustainable mixed communities we will encourage a mix of housetypes on development sites. Support for the development bid is noted.

565: We note the respondent's comments regarding development viability, however the Housing Need and Demand Assessment (2017) has identified there is a need for housing designed to suit the needs of an ageing population. This may include adaptable/ accessible homes, or more smaller units for downsizing. To support organic, sustainable mixed communities we will encourage a mix of housetypes on development sites.

## **Main Issue 10: Residential Care Facilities**

### **Option 1**

549: It is unclear what the context of the respondent's comments are. Triple Kirks received planning permission and was constructed for student accommodation development; the applicant sought a later amendment to vary the mix of accommodation types within that development. The development is to comprise a mix of student accommodation and other residential accommodation.

### **Option 2**

018, 271, 361, 367, 368, 451, 456, 562, 56: Selection for Option 2 noted.

445: Comments are noted. We agree that appropriate residential solutions are needed in the City to accommodate our ageing population and allow a choice of homes for various demographics and needs.

472: The respondent supports inclusion of care facilities within all developments over a certain threshold. These should be accessible to transport links and amenities. The draft policy has been set out to offer key guidance on proposals that include this type of residential care facility which currently does not exist in the ALDP. As such, the principle of good location in terms of accessibility and amenities is a key principle of this policy. For viability reasons for applicants we would not support the inclusion of these facilities as a requirement of all development proposals of a certain size. We do however support a broad mix of housetypes and sizes as part of the H4 Housing Mix and Need policy.

544: We agree that appropriate residential solutions are needed in the City to accommodate our ageing population and allow a choice of homes for various demographics and needs.

574: We undertake broad-ranging consultation in the plan-making process in order to create an ALDP that can be supported by all stakeholders; including health bodies, developers and local communities. Our Health and Wellbeing chapter has been introduced to the Proposed ALDP which was formed in consultation with the Aberdeen Health and Social Care Partnership and NHS Grampian, containing a policy on Residential Care Facilities.

599: The respondent queries whether facilities would be constrained by standards sought for the development. The draft policy has been set out to offer key guidance on proposals that include this type of residential care facility which currently does not exist in the ALDP. As such, the principle of good location in terms of accessibility and amenities is a key principle of this policy. This is in line with Scottish Planning Policy which advocated 'the right development in the right place'.

### **Option 3**

022, 366, 479: Selection for Option 3 noted.

318: We agree that all planning applications will be assessed on their own merits

### **General Comment**

284: The ALDP must identify land to accommodate homes and employment land in the City, as required by the Aberdeen City and Shire Strategic Development Plan. We support the provision for appropriate residential solutions are needed in the City to accommodate our ageing population and allow a choice of homes for various demographics and needs.

291: The context of the respondent's comments remain unclear; residential care facilities are largely operated by other organisations or joint-enterprises with NHS, unfortunately funding is not an issue the Proposed ALDP can influence.

390: We undertake broad-ranging consultation in the plan-making process in order to create an ALDP that can be supported by all stakeholders; including health bodies, developers and local communities.

457, 020: Comments are noted. However, the Proposed ALDP is unable to address these issues.

526: Respondent suggests that Opportunity Sites should be identified for such uses. Opportunity Sites are brought forward on the basis of 'development bids'. These are submitted to us by landowners, developers and agents, suggesting what could be developed on their land. There is some scope to consider residential care facilities for a site when we allocate it in the ALDP, but it is subject to development viability of the applicant.

### **Main Issue 11: Student Accommodation**

#### **Option 1**

441, 560: Respondents select Option 1 (current approach)

542: Respondent suggests better communication is needed with the universities to establish accommodation needs with regards to the Main Issues Report Policy H9 (now H7 Student Accommodation Developments). Developers and student accommodation factors may undertake discussions with the education institutions as part of their viability studies for potential development. The Council may require supporting evidence that the institutions

require further accommodation as part of a planning application. Newer, more modern developments may also be more attractive to live in for prospective students.

## **Option 2**

018, 022, 271, 367, 456, 472, 562, 563, 574, 554: Respondents select Option 2 (preferred approach)

361: Respondent believes student accommodation provision is too high. Applicants may submit a planning application to the Council if they believe they have identified an opportunity for student accommodation. The applicant may undertake viability studies, and the application will be assessed by the Council on its own merits.

445: Respondent believes student accommodation provision is too high. Applicants may submit a planning application to the Council if they believe they have identified an opportunity for student accommodation. The applicant may undertake viability studies, and the application will be assessed by the Council on its own merits.

451: Respondent suggests sustainable locations should precede H1 (Residential) areas as suggested in the Report. These comments are noted and we do support 'the right development in the right place', in line with Scottish Planning Policy. The Proposed ALDP does support sustainable and active travel for new developments via other policies.

599: Support for a new policy is noted. Any future planning applications for student accommodation will be assessed as individual proposals in line with the Development Management procedure.

## **Option 3**

368, 479: Support noted.

318: Respondent suggests integrating student accommodation with residential care facilities. We support 'the right development in the right place', in line with Scottish Planning Policy, and we will continue to support sustainable mixed communities. Any proposals for either student accommodation or residential care facilities will be assessed on their own merits. Amenity, location, accessibility and proximity to local facilities will all be taken into consideration in the case of either development.

366: Respondent believes student accommodation provision is too high. Applicants may submit a planning application to the Council if they believe they have identified an opportunity for student accommodation. The applicant may undertake viability studies, and the application will be assessed by the Council on its own merits.

## **General Comment**

003: Respondent supports zero-parking student accommodation developments. There are zero-parking developments in the City. We are supportive of sustainable and active travel in new developments. Development proposals will be unique and will respond to the individual site and its context; therefore, there may be circumstances where zero-parking is the best



solution for that site. The Council may request the inclusion of 'disabled' parking bays within a development to cater for those with accessibility limitations.

020: Respondent suggests the re-use of properties on Union Street. The Council are currently working on ways to encourage the re-use of buildings in the City Centre, mainly upper floors on Union Street. The Plan supports the reuse of buildings and brownfield sites. We are also considering how the Plan can support City Centre Living. Notwithstanding, in principle, proposals for student properties accommodation in the City Centre could be considered favourably (subject to relevant policies) with a central location and public transport opportunities for students.

037: Respondent queries if the policy is required. In recent years, the Council received a high number of planning applications for student accommodation. This trend coincided with the preparation of the current adopted Plan, and the opportunity to include a dedicated policy was missed. These numbers have since declined; however, the provision of a policy would assist the Development Management process in assessing any future proposals, should they come forward.

284: Developers and student accommodation factors may undertake discussions with the education institutions as part of their viability studies for potential development. Notwithstanding, the Planning process should be able to advise on the appropriateness of development should a proposal come forward.

489: Support for the proposed policy and associated comments are noted. The Proposed ALDP now contains Policy H7 (Student Accommodation Developments) for consideration.

#### **Planning authority action/recommendation for Proposed Plan**

Existing policy for Housing Mix carried forward with emphasis on consideration for housing mixes that reflect need in the area, based on demographic changes.

Policy on Student Accommodation development to be introduced in the Plan.

Policy on Specialist Care Facilities is to be introduced in the Plan, under the new Health and Wellbeing topic.

<b>Issue 19</b>	<b>Houses in Multiple Occupation</b>
<b>Section of the MIR to which the issue relates:</b>	Main Issue 12 – Houses in Multiple Occupation
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Option 1</b></p> <p>441, 542: Supports current approach in Option 1</p> <p><b>Option 2</b></p> <p>018, 022, 361, 367, 456, 554, 560, 562, 599: Supports preferred option.</p> <p>368: Cites Garthdee as an example of high HMOs with amenity/ nuisance behaviour. Plan should curtail number of HMOs</p> <p>445: Greater emphasis on the protection of neighbours' interests.</p> <p>472: Policy needs to be drawn up in conjunction with those communities most affected</p> <p>552: Should also cover Airbnb holiday-type lets to avoid areas becoming transient</p> <p>554: Encourage through planning process and work with developers to create solution</p> <p><b>Option 3</b></p> <p>451, 471, 479: Supports option 3</p> <p>318: Units can be beneficial if they're properly managed</p> <p>366: Too many HMOs at present, anecdotal observations about amenity and nuisance behaviour.</p> <p><b>Management of HMOs</b></p> <p>003: HMOs must be managed carefully for the amenity of neighbours.</p> <p>020: Make affordable housing and houses for multiple occupation conditions of planning permission</p> <p><b>Does not support HMOs</b></p> <p>018: Suggests a presumption against granting of HMOs. HMOs are damaging to communities.</p>	

451: Strongly in favour of an overprovision policy. Cites the Dundee process as an example of how this should be implemented. Respondent believes that the wording of the report is unbalanced and does not account for the needs of the community.

### **General Comments**

612: Respondent observes the anti-HMO movement in Old Aberdeen area is driven by an unrepresentative section of the community. Notes excessive regulation on HMO compared with any other form of occupied property and considered discriminatory. Notes there is no requirement for HMO restrictions. The University has been operational for over 500 years, this is not a new issue. Planning restrictions may exacerbate the issue

627: Notes that other local authorities have planning policies for HMO Overprovision. Supports a HMO Overprovision planning policy. Analysis of Main Issue options is given; and the proposed policy has been deemed ineffective. Expresses concerns over the implementation of a HMO policy as proposed. Respondent notes issues with proliferation of HMOs in certain areas of the city; including nuisance behaviour, social cohesion, crime, property availability/ cost, and impact on local businesses Respondent suggests their area is saturated with HMOs and that HMOs are not conducive to 'sustainable mixed communities'

### **HMO Licensing**

489: Supportive of current licensing arrangements

### **Potential HMO Policy**

489: Notes that the Council previously considered an 'overprovision' policy has previously been recommended against. Respondent supports a relevant policy for HMOs, but the proposed policy is effectively for overprovision. Aspects of the draft policy are still ambiguous.

542: Respondent is against planning restrictions on HMOs. The market is changing, and HMOs exist due to the demand; there has been a demand in the Aberdeen University area for student housing. Restrictions could distort the market.

599: Tighter restrictions may be needed in areas which attract highest densities to ensure 'sustainable mixed communities' in all local areas

### **Issue 19: Houses in Multiple Occupation - Percentage Limit**

#### **Option 1 (15%)**

022, 367, 441, 489, 554, 560, 563: Supports Option 1

003: I would not like a HMO next door to me

018: 15% is too high but there was no lower option

020: Would spread HMOs across more areas

361, 368: Cites overprovision and issues with students in the Garthdee area

366: Personal experiences living near HMOs

271, 471, Maintain community function over long term

445: Many of these properties attract too much unwelcome attention from police and other social services

451, 472: 12% limit would best reflect a good mix of residents

456: Owner-occupation provided for best upkeep & maintenance of local standards therefore lowest possible value is best

562: Believe this would provide a good mix of different accommodation types

037: Not aware of issues – just picked an option

### **Option 2 (20%)**

574, 599: Option 2

318: Seems appropriate to avoid dominance

### **Option 3 (25%)**

479: HMOs restricted to areas for which they are suitable, i.e. good transport links, rather than being scattered over a wider area.

### **Opposes threshold**

542: There should be no restriction – respondent notes this could be discrimination based on age if it is students who are affected.

### **Supports a lower threshold**

627: Respondent supports 10% limit

### **Question: Boundaries**

#### **Option 1 (Ward Boundary)**

018, 022, 367, 441, 471, 560, 563: Option 1 supported

271, 368, 445, 456, 472, 479, 489: Wards are already a recognised boundary

366: Residents can contact Councillors Community Council to report issues

562: Largest of the three options and can ensure HMOs are spread evenly

### **Option 2 (Census Output - Small Datazones)**

574, 599: Option 2 supported

361: HMOs are a 'local' problem, so a smaller area might be more appropriate

### **Option 3 (Census Output – Intermediate Datazones)**

318, 627: Option 3 supported

451: Small Data Zones are not ideal but is the only worthwhile zone to consider if ACC intends to limit HMO localised density

### **Opposes threshold**

542: There should be no discrimination

### **Question: Property Threshold**

#### **Option 1**

271, 367, 441, 471, 560, 563: Option 1 supported

445: No particular reason other than option 1 would lead to much more work to monitor and process.

562: Strikes a balance to be effective without requiring a large number of planning applications

#### **Option 2**

022, 361, 472, 574, 599: Option 2 supported

003: Flats are normally smaller than houses

020: To avoid overcrowding

552: This supports the licensing requirements of Airbnb businesses

#### **Option 3**

366, 627: Option 3

318: Consider all applications on their own merits

018: Much more scrutiny is needed as HMOs are damaging to communities and abused by landlords.

368: Encourages accountability

451: Irrespective of flat or house, a property with a large number of non-related persons is likely to exacerbate various issues, so we do not see any meaningful difference between a house and a flat. No justification for extending beyond the current '5 or more' limit. Planning permission should be requirement when there are 3 or more people in a flat, 3 or more people in a house.

456: Every HMO application should be subject to scrutiny & explanation of why it is required

479: Would have said 4 or more unrelated people, but that option wasn't available.

### **Opposes threshold**

542: Previous proposals by the Council have been consulted on and rejected.

## **Summary of response by planning authority:**

### **Option 1**

441, 542: Respondents support the 'current approach' to how the Council processes planning applications; consider them on their own basis using other relevant policies in the Plan. As identified through the Main Issues Report process, this option has its strengths and weaknesses. A dedicated policy could have the potential to allow Officers direct involvement in more HMO planning applications to manage provision in the City.

### **Option 2**

018, 022, 361, 367, 456, 554, 560, 562, 599: Respondents support the 'preferred option' where a new policy would be implemented to consider future planning applications for HMOs. As identified through the Main Issues Report process, this option has its strengths and weaknesses. It has been noted from the consultation that a dedicated HMO policy would be supported; both by local communities and to allow Officers direct involvement in more HMO planning applications, helping to manage provision in the City. We have decided that an overprovision policy is to be included in the Proposed Aberdeen Local Development Plan (ALDP) for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision).

368, 445, 472, 552: Respondent supports a dedicated HMO policy and suggests better protection of neighbours' amenity. As identified through the Main Issues Report process, this option has its strengths and weaknesses. It has been noted from the consultation that a dedicated HMO policy would be supported; both by local communities and to allow Officers direct involvement in more HMO planning applications, helping to manage provision in the City. We have decided that an overprovision policy is to be included in the Proposed ALDP

for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision)

554: Respondent supports HMO management through the planning system and collaboration with developers. We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision).

The HMO process in Aberdeen City Council is a joint process between licensing and planning permission. There is also a lack of defined planning legislation and guidance on HMOs. Therefore, the planning system can only manage these properties to a certain extent. The Council will work with property owners, landlords, developers, etc as well as local communities, with regards to any prospective application, to ensure a satisfactory outcome for all parties.

### **Option 3**

451, 471, 479: Respondents support the 'alternative option' of an overprovision policy for HMOs with specified limits and thresholds. This support is noted.

318: Respondent notes HMOs can be beneficial under appropriate management. We agree that HMOs contribute to successful and sustainable mixed communities.

366: Respondent believes there are too many HMOs presently and cites antisocial behaviour. It has been noted by residents in certain areas of the City that excessive numbers of HMOs no longer contribute to sustainable mixed communities, and we must consider different ways of how to manage this to uphold high standards of amenity for all residents. We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision).

Any antisocial/ nuisance behaviour associated with specific HMOs should be reported to the relevant authorities. We do however support that HMOs can contribute to successful and sustainable mixed communities if managed correctly.

### **Management of HMOs**

003: Respondent notes that HMOs must be carefully managed for the amenity of neighbours. As a Council we agree that the amenity and quality of life of the City's residents should be of a high standard. Whilst the management of licensed HMO properties is not a consideration of planning, we encourage anyone experiencing antisocial or nuisance behaviour to contact the Council directly.

020: Respondent suggests that HMOs should be conditioned as part of planning permissions as affordable housing is. HMOs are necessary when the use of a residential property has materially changed (i.e. cohabitation of unrelated persons). There is presently no requirement in legislation or Scottish Planning Policy to include HMO contributions on a

site. It is difficult to predict the demand for such properties, so the planning and licensing processes allow for the supply to be driven by the demand through the submission of applications.

### **Does not support HMOs**

018: Respondent suggests a presumption against HMOs due to their harmful effect on communities. HMOs make sustainable use of existing housing stock in the City and provide housing for a section of the City's population that require such arrangements. The Proposed ALDP supports the creation and maintenance of sustainable mixed communities, which HMOs can contribute to. However, we do note comments received on overprovision of HMOs in certain parts of the City so we have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). Any antisocial/ nuisance behaviour associated with specific HMOs should be reported to the relevant authorities.

451: Respondent supports an overprovision policy and believes that the Main Issues Report has been written in an unbalanced way. The Main Issues Report is a consultation document that seeks to gather the views and experiences of local communities and other stakeholders. The topic of HMOs has been presented as a Main Issue to facilitate discussion on the current situation in the City. The idea of an overprovision policy was also presented as part of this consultation. There are various views and experiences across various sections of local communities which we must consider and respond to. We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision).

### **General Comments**

612: Respondent notes that local community bodies are not always representative of the community and that overprovision restrictions could be considered discriminatory. We agree that HMOs can help to make use of existing housing stock in a sustainable way and accommodate different sections of the local community. The Main Issues Report provides a vehicle for discussion in order to gather views and experiences from local communities. It has been noted by residents in certain areas of the City that excessive numbers of HMOs no longer contribute to sustainable mixed communities, and we must consider different ways of how to manage this to uphold high standards of amenity for all residents.

627: Respondent supports an overprovision policy, noting that other Local Authorities have this. Respondent suggests the proposed policy would be ineffective. Also, reference to saturation of HMOs in certain areas of the City. The Main Issues Report provides a vehicle for discussion in order to gather views and experiences from local communities. We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision).



Other Local Authorities may have different policies to Aberdeen, however this is unique to their organisations and geographical and societal context. It has been noted by residents in certain areas of the City that excessive numbers of HMOs no longer contribute to sustainable mixed communities, and we must consider different ways of how to manage this to uphold high standards of amenity for all residents. Any antisocial/ nuisance behaviour associated with specific HMOs should be reported to the relevant authorities.

### **HMO Licensing**

489: The respondent notes their support of the current licensing process. The Proposed ALDP will consider HMOs from a planning perspective and it is unlikely that changes to the licensing process would arise from this consultation.

### **Potential HMO Policy**

489: The respondent has provided comment on previous consultation on 'overprovision' policies, and the draft policy in the Report is ambiguous. The Main Issues Report provides a vehicle for discussion in order to gather views and experiences from local communities. Any draft policy would require further refining prior to the Proposed ALDP - and is subject to further public consultation. Previous consideration of overprovision policies has taken place to respond to concerns of certain part of the City. We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision)

542: Respondent is against the restriction of HMOs, which respond to need and demand of the market. The Proposed ALDP supports the creation and maintenance of sustainable mixed communities. HMOs can help to make use of existing housing stock in a sustainable way and accommodate different sections of the local community. It has been noted by residents in certain areas of the City that excessive numbers of HMOs no longer contribute to sustainable mixed communities, and we must consider different ways of how to manage this to uphold high standards of amenity for all residents.

599: Respondent notes that certain areas may need restrictions where more HMOs are expected. We agree that HMOs can help to make use of existing housing stock in a sustainable way and accommodate different sections of the local community. It has been noted by residents in certain areas of the City that excessive numbers of HMOs no longer contribute to sustainable mixed communities, and we must consider different ways of how to manage this to uphold high standards of amenity for all residents. We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision).

### **Issue 19: Houses in Multiple Occupation - Percentage Limit**

#### **Option 1 (15%)**

022, 367, 441, 489, 554, 560, 563, 003, 018, 020, 361, 368, 366, 271, 471, 445, 451, 472, 456, 562, 037: Respondents have selected Option 1 (15% limit). Some of the respondents

note the negative impact of high concentrations of HMOs as justification of their choice. This option has been selected for Policy H8 (Houses in Multiple Occupation and Overprovision) as a result of the majority outcome of those who responded to the Main Issues Report consultation.

### **Option 2 (20%)**

574, 599, 318: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). This was preferred by a majority of those who responded to the Main Issues Report consultation.

### **Option 3 (25%)**

479: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). This was preferred by a majority of those who responded to the Main Issues Report consultation.

### **Opposes threshold**

542: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). Planning applications are determined on the basis of the Development Plan and material considerations; the occupiers of HMO properties would not form part of that consideration. Any concerns about discrimination of specific sectors of the community should be discussed with the Council.

### **Supports a lower threshold**

627: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). This was preferred by a majority of those who responded to the Main Issues Report consultation.

### **Question: Boundaries**

#### **Option 1 (Ward Boundary)**

018, 022, 367, 441, 471, 560, 563, 271, 368, 445, 456, 472, 479, 489, 366, 562: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). With further investigation into the implementation and monitoring of an overprovision process, we have found that Small Data Zones may be the most efficient boundary area to proceed with.

#### **Option 2 (Census Output -Small Datazones)**

574, 599, 361: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). With further investigation into the implementation and monitoring of an overprovision process, we have found that Small Data Zones may be the most efficient boundary area to proceed with.

### **Option 3 (Census Output – Intermediate Datazones)**

318, 627, 451: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). With further investigation into the implementation and monitoring of an overprovision process, we have found that Small Data Zones may be the most efficient boundary area to proceed with.

### **Opposes threshold**

542: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). Planning applications are determined on the basis of the Development Plan and material considerations; the occupiers of HMO properties would not form part of that consideration. Any concerns about discrimination of specific sectors of the community should be discussed with the Council.

### **Question: Property Threshold**

#### **Option 1**

271, 367, 441, 471, 560, 563, 445, 562: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). Planning permission will be sought for HMO applications for flats and houses with 6 or more occupants.

#### **Option 2**

022, 361, 472, 574, 599, 003, 020, 552: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). Planning permission will be sought for HMO applications for flats and houses with 6 or more occupants.

#### **Option 3**

366, 627, 318, 018, 368, 451, 456, 479: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). Planning permission will be sought for HMO applications for flats and houses with 6 or more occupants.

### **Opposes threshold**

542: We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision). Overprovision has been explored within the Council previously with our Housing and HMO Licensing team. The issue has been raised by members of the public, and by consulting upon this topic in the Main Issue Report we have decided to proceed with a potential new policy.

### **Planning authority action/recommendation for Proposed Plan**

Policy for Houses in Multiple Occupation (HMOs) and overprovision to be introduced, based on consultation during Pre-Main Issues and Main Issues Report stages.

Main Issue 19 invited views on the percentage 'threshold' for this overprovision element. Some respondents sought a lower percentage than those provided, however the suggested limits were at times unrealistic and may be considered unduly restrictive. The limit taken forward for the policy is 15% based on the majority of respondents' preference.

Whilst HMOs are important in contributing to the choice of housing in the city, we do recognise that some areas in the city are affected by HMOs differently than others and that there is an opportunity to monitor this. The recommended 15% overprovision limit, applied to the Small Data Zones boundaries, should allow ample monitoring of the differing areas in the city, whilst allowing flexibility for supporting sustainable mixed communities.

<b>Issue 20</b>	<b>Community Planning</b>
<b>Section of the MIR to which the issue relates:</b>	Section 8.7 Community Planning
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Question 27: Supporting the LOIP and Community Planning</b></p> <p>318: Aberdeen should look to other UK and international cities</p> <p>284: No more development</p> <p><b>General Comments</b></p> <p>451: Community Planning should start on the basis of taking the wishes of the community into consideration</p> <p>542: Yes. Do not try to manage where people can or cannot live.</p> <p>599: Community planning and LOIP is too immature to fit with the 5-10 year land use planning system. Better to try and integrate the two system in the 2027/2032 plan and monitor their interaction at present.</p> <p><b>General Comments – Support</b></p> <p>544: Supports LOIP and the ‘prosperous’ headings within this MIR are an evident link to the LOIP</p> <p>619: Respondent discusses introduction of Local Place Plans – as noted in The Planning (Scotland) Bill. Respondent welcomes this, noting benefits to communities and opening dialogue with community councils, developers and public sector partners</p> <p><b>Question 28: Changing Places Toilets</b></p> <p>018, 271, 291, 361, 367, 368, 456, 472, 562: All large new venues catering commercially to the public should supply such facilities</p> <p>022: Anywhere with a capacity of more than 25</p> <p>284, 451, 554, 560: All public places</p> <p>366 All types of venues should provide this</p>	

384: Supports in principle – needs to be clarity in circumstances of when they would be required

479: Agrees but suggests provision of more toilets in general

544: Supports suggestion that developments include Changing Places. Provision of these facilities is a key factor in increasing the overall accessibility of public facilities and the city as a whole

### **Other Comments**

318: Refers to existing statutory guidelines

445: If the Council are not maintaining public toilets properly then they must come up with alternative solutions

574, 599: There should be a broader policy on public access to toilets including 'changing places'

### **Summary of response by planning authority:**

#### **Question 27: Supporting the LOIP and Community Planning**

318: Respondent suggests that Aberdeen look at other national and international cities for inspiration in community planning. Comments are noted. We regularly seek opportunities to adapt 'best practice' to the context of Aberdeen City.

284: Respondent does not support further development. Comments are noted. Targets for housing and employment land are set by the Strategic Development Plan for the Aberdeen City and Aberdeenshire region. The Proposed ALDP must set out how these targets can be met, in line with the requirements of the Planning (Scotland) Act 1997 and Planning etc. (Scotland) Act 2006.

#### **General Comments**

451: Respondent supports community planning that takes into account the wishes of the community. We work in consultation with Community Councils, Elected Members and the general public in the plan preparation process. There are opportunities for consultation during this process, but we also respond to general enquiries in the interim periods.

542: Respondent suggests that community planning should not try to manage where people can or cannot live. Land is identified for development through the plan making process, where certain sites are put forward for development by various parties and assessed by the Council. The sites we believe are most sustainable and suitable for development (such as housing) will be zoned in the Proposed ALDP

599: Respondent identifies possible issues with aligning the LOIP and the Proposed ALDP. We note that in the recent Planning (Scotland) Act 2019 that Local Development Plans will

need to align closely with the LOIP in forthcoming legislation. At present we do account for our LOIP in the Proposed ALDP and will continue to ensure they align and support each other's aims.

### **General Comments – Support**

544: Respondent supports the links with the LOIP, particularly the 'prosperous' headings. Comments are noted. We aim to align the Proposed ALDP with the objectives set out in the LOIP and other Council strategies.

619: Respondent notes the proposed Local Place Plans introduced in the Planning (Scotland) Act 2019. Comments are noted. We will continue to monitor the emerging legislation, however with the timescales of the next Local Development Plan (2022) adoption, it is unlikely that Local Place Plans will be applicable for this Plan, but perhaps the next.

### **Question 28: Changing Places Toilets**

018, 271, 291, 361, 367, 368, 456, 472, 562, 022, 284, 451, 554, 560, 366, 384, 479, 544: We agree that large, public venues would be appropriate locations for such facilities. We must also consider whether these facilities can be retrofitted into such venues. We have included a new chapter in the Proposed ALDP dedicated to Health and Well-being. This chapter will contain a policy for the provision of Changing Places Toilets in the new Health and Well-being chapter.

### **Other Comments**

318: Comments are noted. Building Standards and other relevant guidelines will be consulted via the Development Management, we are considering the inclusion of facilities in the context of the Local Development Plan and whether this can be supported through policy or other local guidance.

455: Comments are noted. We appreciate the observations of local facilities; however these issues cannot be addressed by the Proposed ALDP.

574, 599: Comments are noted. We are considering the inclusion of facilities in the context of the Local Development Plan and whether this can be supported through policy or other local guidance.

### **Planning authority action/recommendation for Proposed Plan**

Introduce new policy on Changing Places Toilets

<b>Issue 21</b>	<b>New Policies</b>
<b>Section of the MIR to which the issue relates:</b>	Appendix 1 – Proposed Draft New Policies
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Policy H4 (Housing Mix and Need)</b></p> <p>451: Agrees with policy. Recent developments seem to avoid these features. Design for 'lifetime living' is strongly supported</p> <p>471: Support a mix of housing in new development. It should be consistent with a neighbourhood analysis and encourage a mix of property sizes for different age groups and budgets</p> <p>472: Any development should have a mixture of housing for all needs</p> <p>488: Do not believe that planning policy should duplicate Building Standards requirements and, as such, does not support the wording within this draft policy</p> <p>540: Does not support introduction of housing mix restrictions via policy</p> <p>560: Supports more developments that include varying needs</p> <p>554: Yes need more of this</p> <p><b>Policy H8 (Residential Care)</b></p> <p>472: Should be accessible by public transport and near to amenities</p> <p>554: Not everyone wants flatted accommodation – downsizing is more accurate</p> <p><b>Policy H9 (Student Accommodation)</b></p> <p>451: Applications to build student accommodation do not attract developer contributions, so we agree that any application for change of use should require retrospective developer contribution to be fully addressed along with the other normal planning requirements.</p> <p>549: Policy makes it too easy for a developer to re-designate student flats as general accommodation</p> <p>554: Sufficient supply at present</p> <p><b>Policy H10 (HMO's)</b></p>	



361: Policy could refer to where the HMO is not appropriate to the area (i.e. a quite residential area with no apparent need)

445: All conditions need to be strictly monitored

451: Fully support a robust policy regarding restricting localised density of HMO properties. The line item regarding 'excessive concentration' can only be meaningful if the smallest possible locality area is used to determine density. While the Census Output Area may be acceptable as a practical and simple to operate measurement, the gold standard will always be to limit the number of properties within a small radius based on the centre of any property, as that is how residents are impacted. A robust HMO policy (12% limit within each Census Output Area - or an equivalent highly localised area) is essential for Old Aberdeen.

472: Should be limited to 12%

542: There should be no policy. Proposal is discriminatory as it decided who can or cannot live in a house. Market forces should be used. Restrictions will not solve the issue. Respondent queries what the issue is with families wanting to live in the suburbs and students wanting to live next to their work

549: Agrees

554: Even distribution instead of heavy concentrated areas

### **Policy D2 Amenity**

271: Criteria needs to be clear.

445: Main criteria are covered.

471: A policy is needed for house modifications.

472: Developers needs to deliver what is outlined in their proposals without deviations

540: Do not support minimum standards for internal floor areas via policy.

549: Support reference to air quality.

554, 560: Support amenity space

### **Policy D5 Advertising and Signage**

549: Term 'sensitivity sited' is vague.

554, 560: Supports quality signage.

### **Policy D8 Shopfronts**

445, 451, 560: Support the policy, including the restoration of historic shopfronts.

481: The changing nature of retail means proposals should be considered on their own merit.

451: The existing TAN focussed on Union Street. It should be made clear the policy applies to all conservation areas.

### **Policy D9 Windows and Doors**

445, 451, 471, 472, 549, 554, 560: Agree with the policy.

560: Proposals should be in keeping with the originals but more eco-friendly.

471: The design of dormer windows is important with regard to retention of existing materials and styles.

### **Policy NC9 City Centre Living**

478: Support this policy. Addresses concerned outlined in Issue 9. Recommend policy is extended to reference 'noise-generating' cultural uses, and recommend that it includes neighbours and adjacent development, not just development within the same built structure.

562: Agree with this policy.

### **Policy NC10 24 Hour City**

478: Supportive of this policy.

549: Aim 5 is not realistic and this policy does not sufficiently consider the costs of crime, disorder and the short and long term effects of 24hour alcohol on sales and gambling.

554: Aim 3 – diversify the range of night time activities e.g cafes, libraries, galleries and not all pubs/clubs so that City Centre living with a residential mix can be encouraged.

560: Supports a mix of places open suitable for all ages (families and older people) e.g cafes, tearooms, visitor attractions, later museum openings etc. Not just pubs and night clubs.

### **Policy NC11 Visitor Attractions and Facilities**

549: Policy is vague.

554: Important not to just have these in the city centre only. Need to look after what we do have there and host events etc to keep it interesting and vibrant.

560: Need attractions to suit a wide range of interests and not necessarily all located in the city centre.

562: Support policy. Aberdeen Mosque and Community Centre will attract international investment, tourism and support the knowledge economy.

### **Policy NC12 Public Art**

591, 610: Wording of Policy NC12 suggests that all developments will be required to allocate 1% of their construction costs. It is understood the intention is for the policy to apply to large scale commercial development in the city centre but this does not translate to the draft policy wording. If a policy is to implemented it should clearly distinguish that it relates only to city centre development.

591: Commercial development does not yield developer contributions on education and community facilities and in this respect a percentage for art policy is likely to be more viable.

### **Summary of response by planning authority:**

#### **Policy H4 (Housing Mix and Need)**

451, 471, 472: Support for proposed policy is noted and welcomed. We support the principle of sustainable mixed communities and providing homes for varying needs and demographics.

488: Comments are noted. The Policy has been re-worded following feedback on the draft content in the Report. The wording of Policy H4 emphasises the need for greater housing mix rather than adaptable units.

540: Comments are noted. Policy does not seek to restrict development proposals, only encourage a wider mix of housetype options to cater for the identified housing need and demand in the City

560, 554: The principle of sustainable mixed communities and providing homes for varying needs and demographics is a key theme of the Proposed ALDP. We hope to achieve this through the proposed policies, including Policy H4.

#### **Policy H8 (Residential Care)**

472: We agree that residential care facilities should be accessible by a wide range of transport modes. Accessibility and sustainable and active travel are also contained within other policies in the Proposed ALDP and are material considerations in the Development Management process.

554: The Policy does not seek to promote a specific development type but encourage a wider mix of housing options to cater for the identified housing need and demand in the City that has arising from the changing demographics.

#### **Policy H9 (Student Accommodation)**

451: At present, this would be required regardless of policy presence. We note the comments provided in relation to Developer Obligations.

549: Any proposal for change of use would require assessment under the Development Management process to determine whether developer obligations would be necessary. Comments are noted.

554: A new policy would aid the Development Management process should future proposals for new student accommodation come forward. A planning application for student accommodation may come forward at any time, regardless of the supply.

### **Policy H10 (HMO's)**

361: Houses in Multiple Occupation can accommodate a wide range cross-section of the community. Suitability of the location and context of a proposed HMO would be considered as part of the Development Management and HMO Licensing process.

445: The requirement and enforcement of planning conditions is unrelated to the Proposed ALDP but we do agree that conditions should be fulfilled as required.

451: We provided the options as a means of consultation to gather views from local communities and other stakeholders. We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision)

472: We provided the options as a means of consultation to gather views from local communities and other stakeholders. We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision)

542: We provided the options as a means of consultation to gather views from local communities and other stakeholders. Overprovision policies are not uncommon in Local Authorities in Scotland. This is to manage any potential anti-social or nuisance behaviour that may arise from a saturation of HMO properties in a single area, and to encourage better distribution of HMOs. We have decided that an overprovision policy is to be included in the Proposed ALDP for consultation, which sets a 15% threshold within Small Data Zones (Policy H8 Houses in Multiple Occupation and Overprovision)

549: Support for proposed policy is noted. We support the principle of sustainable mixed communities and providing homes for varying needs and demographics.

554: We support the principle of sustainable mixed communities and providing homes for varying needs and demographics. There may be certain areas that experience higher demand for HMOs and the proposed Policy H8 seeks to manage this by monitoring overprovision.

### **Policy D2 Amenity**

271: Agree the criteria needs to be clear.

445: Note the comment.

471: Guidance on house modifications can be found within supplementary guidance: householder development guide. It is anticipated this document will be carried forward to the next ALDP. The principles of quality placemaking are expected with development.

472: Developers have to provide what is outlined within approved planning applications. Planning applications can be modified but further consent is required to do so.

540: The comment not supporting a policy on internal space standards is noted.

549: Support for the reference to air quality is mentioned.

554, 560: Support for amenity space is noted.

### **Policy D5 Advertising and Signage**

549: The policy will be further expanded by a guidance document. 'Sensitivity sited' will ensure the location of the sign has been considered in terms of its impact on the building, streetscape, public realm and wider context.

554, 560: The support for the policy is noted.

### **Policy D8 Shopfronts**

445, 451, 560: The support for the policy is welcomed and noted.

481: All proposals should be considered on their own merit. By doing so they need to have consideration of the existing context. The policy is for all shopfront not just retail proposals.

451: The existing supplementary guidance document outlined principles that need to be applied to historic shopfronts and new shopfronts for the whole city.

### **Policy D9 Windows and Doors**

445, 451, 471, 472, 549, 554, 560: Support for the policy is noted and welcomed.

560: Historic Environment Scotland has produced guidance notes and advice on increasing the energy efficiency of historic features. Simple adaptations to existing features can ensure good values and no loss of embodied energy.

471: The principle of retain, repair and restore will be applied to dormer windows. Comment is noted.

### **Policy NC9 City Centre Living**

478, 562: Support for policy VC5: City Centre Living (previously draft policy NC9) is welcomed. The policy will go forward for inclusion in the Proposed Aberdeen Local Development Plan.

478: Amenity forms part of successful placemaking and consideration has to be given to the impact of proposed development on adjoining uses. Further to this the recent letter from the Chief Planner discusses the Agent of Change principle and the Proposed ALDP will make reference to this. Development proposals will be subject to consideration of all relevant policies. Policy VC5 (previously draft policy NC9) aims to ensure that new residential proposal (new or conversion) within the city centre can achieve suitable residential amenity and focuses on the actual footprint of the proposal. Other policies including D2: Design and Amenity require consideration as to how existing uses would impact on the ability to deliver suitable residential amenity. There is no need to duplicate policy provision held elsewhere in the plan. Further guidance will be provided in Aberdeen Planning Guidance.

### **Policy NC10 24 Hour City**

478: Support for the policy is welcomed.

549: The onus is on the applicant to demonstrate that suitable residential amenity can be maintained or achieved as part of the planning application process.

554, 560: The aim of criterion 3 was to ensure that new proposals diversify the range of night time activities. It was not an exhaustive list nor did it focus on any specific use. All of the aforementioned have a role to play in creating a sense of place important to local residents and visitors alike.

### **Policy NC11 Visitor Attractions and Facilities**

549, 562: Comments are noted.

554, 560: The city centre should remain the focus for all significant footfall generating development.

560: We do recognise that there may be location specific reasons for visitor attraction proposals elsewhere e.g Greyhope Bay. Where located outwith the city centre, proposals for visitor attractions will be assessed on their own merits in accordance with the Development Plan as and when they come forward.

### **Policy NC12 Public Art**

Comments on NC12: Public Art Contribution are noted. The responses suggest a level of uncertainty with regards to the remit and parameters of a policy for percent for art. The responses received to the main issues report question and draft policy indicate the focus should relate to placemaking, design and public realm rather than be limited to public art in the city centre. It is proposed to include as part of contributions to the public realm, including open space and urban realm. This will particularly relate to proposals with a visible and/or high public profile.

**Planning authority action/recommendation for Proposed Plan**

D5 – It has been decided not to take this policy forward as the issue is already covered in legislation.

D8 - No amendments to policy text have been suggested. Clarify that policy applies to all shopfronts in all areas of the city.

NC10 - In response to comments received it is proposed to amend the policy (now renamed VC1: Vibrant City) and contextual information to clarify the focus of the policy and what types of uses/developments are being actively encouraged.

NC11 - The extant Network of Centres policy provision already supports the principle of visitor attraction uses within the city centre and will continue to do so in the Proposed ALDP. It is proposed to rename the draft policy NC11: Visitor Attractions and Facilities to VC2: Tourism and Culture and include additional text to the Vibrant City section of the Proposed ALDP with regards to cultural and visitor attractions.

Other more minor drafting amendments are also likely to be made to policies in order to clarify.

<b>Issue 22</b>	<b>Other Issues</b>
<b>Section of the MIR to which the issue relates:</b>	N/A
<b>Planning authority's summary of the comment(s):</b>	
<p><b>Existing Development</b></p> <p>20: Marischal Square is not a positive asset to the city. Relocating Wallace Tower and creating a public square would have been a better intervention.</p> <p>97: The redevelopment of OP26: Auchmill Golf Course has led to an increase of surface water flooding in the local area.</p> <p><b>Main Issues Report Document and Consultation Process</b></p> <p>61: Typographical error</p> <p>272: Commends transparency of Main Issues Report process and document</p> <p><b>Onshore Windfarm Spatial Strategy</b></p> <p>291: Windfarms destroy the environment</p> <p>543: Table 1 and Figure 4 should include ancient woodland as it is likely these will constrain windfarm development</p> <p><b>Strategic Environmental Assessment</b></p> <p>385, 422, 633: Several minor amendments to the Report relating to updating references and assessment of sites and Main Issues are recommended, as detailed in the representations. These relate primarily to mitigation measures and the treatment of individual site assessment.</p> <p>422: Comments submitted on Habitats Regulations Appraisal and water abstraction on the River Dee Special Area of Conservation (SAC), and the proposed extension to Ythan Estuary, Sands of Forvie and Meikle Loch Special Protection Area (SPA).</p> <p>440, 441: B13/08 Agree with assessment of environmental factors</p> <p>562: OP85 King Street/Beach Esplanade The negative impact of development this site will be mitigated, and the development would have a positive effect.</p> <p>583: Site B03/10 and Site B03/11 Sites score more favourably than have been assessed.</p>	



## **Strategic Flood Risk Assessment (version 2 November 2018)**

633: Welcomes the document and its content.

### **Misc**

457: Drains on Garthdee Road are an issue and there are poorly cleaned.

538: Site is located in Danestone Community Council area

### **Summary of response by planning authority:**

#### **Existing Development**

20: Marischal Square was determined based on the planning application submitted. There was no planning application submitted to relocate Wallace Tower or create a public square therefore this was not considered.

97: Surface water flooding issues can be reported to Aberdeen City Council and/or Scottish Water for investigation.

#### **Main Issues Report Document and Consultation Process**

61: Typographical error noted. The link to the consultation could still be found from the main Consultation Hub webpage, and the Local Development Plan webpage. Comments could also be submitted via email, and by letter.

272: Comments are welcomed and noted.

#### **Onshore Windfarm Spatial Strategy**

291, 543: Aberdeen City Council is required through paragraph 161 of Scottish Planning Policy to set out a spatial framework identifying areas that are likely to be most appropriate for onshore wind farms. There are currently no onshore windfarms within Aberdeen City Council boundary. The construction of windfarms is assessed through planning applications, this process allows environmental concerns to be addressed. The criteria for the spatial framework follow the approach set out in Table 1 of Scottish Planning Policy. Ancient woodland is not identified as a criterion within Scottish Planning Policy Table 1.

#### **Strategic Environmental Assessment**

385, 422, 633: The suggested amendments are noted, and will be assessed and appropriately actioned, as required.

422: Comments relating to the Habitats Regulations Appraisal are noted, and will be assessed and appropriately actioned, as required.

440, 441: Comments are noted and welcomed.

562, 583: The assessments of these sites were carried out by Council Officers in accordance with internal guidance and was consistent with the assessment of all other sites in the Main Issues Report. Where the assessments identified potential negative impacts, appropriate mitigation was presented. Strategic Environmental Assessments are also scrutinised by Scottish Natural Heritage, Scottish Environment Protection Agency and Historic Environment Scotland.

### **Strategic Flood Risk Assessment (version 2 November 2018)**

633: Comment is noted and welcomed.

### **Misc**

457: Concerns with drains and their cleaning is not an issue for the Proposed ALDP. This should be reported as a problem through Aberdeen City Council's website.

538: The development bids are separated by ward, not community council. Community councils can make comment on development bids in other community council areas.

### **Planning authority action/recommendation for Proposed Plan**

No significant changes proposed.