

Issue 1	VISION, SPATIAL STRATEGY AND LAND RELEASE POLICY LR1	
Development plan reference:	Pages 1 -39, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Doug Connell (4) Emma De Silva (56) Steve Thomson (146) James McKay (157) Angela Bavidge (234) Lynda A Conn (244) University of Aberdeen (474) Richard Nixon (545) Avril Nixon (546) Cameron Nixon (547) Matthew Nixon (548) Marshall Farms (572) Michael Jack (629) Kathryn Wade (690) Stewart Milne Homes (717) Stewart Milne Homes (744) Scottish Hydro Electric Transmission plc (768) Cults, Bieldside and Milltimber Community Council (833) NESTRANS (880) NHS Grampian (882) Scottish Government (885) Opportunity North East (887) Barratt North Scotland (891) Homes for Scotland (897) CALA Homes (North) Ltd (900) HFD Group Ltd (905) Aberdeen Harbour Board (910) Colin McFadyen (924) Daniel Ralph (1118) Colm O Leochain (1137) Association for the Protection of Rural Scotland (APRS) (1143) HFD Group Ltd (1145) The New Aberdeen Mosque and Community Centre Project (1146) Debi Beattie (1185)</p>		
Provision of the development plan to which the issue relates:	Identifies the Vision for Aberdeen City. Makes provision for phased housing and employment land release, and for the provision of mixed use communities.	

Planning authority's summary of the representation(s):

Development of the Green Belt / Brownfield Development

4, 146: Continued Green Belt development is causing the City Centre to be desolate as people move out of town.

146: Development results in the loss of Green Belt

157: Continued building on green land at behest of profit-seeking developers is short sighted and undemocratic.

234: New development is eroding the Green Belt. Development should be directed to brownfield sites.

629: Note great detail on new suburbs. Concern that brownfield looks like an afterthought.

900: The respondent considers that the Spatial Strategy is flawed as it focuses too greatly on a substantial number of small brownfield sites which there cannot be confidence in delivery. Therefore, there should be consideration of the allocation of greenfield sites to complement the supply of housing land.

924: In commenting on Proposed Local Development Plan paragraph 3.6, the focus should be on brownfield development. 60% of allocations are on greenfield sites. There is sufficient housing stock in the City.

1137: Don't build on green areas. Lack of green space for amenity. Loss of trees to car parking areas. Every city will have Green Belt areas. Comments made regarding aspiration of living adjacent woodland.

1185: Do not build on Green Belt.

Environmental Impacts of Development

56: Further development will result in the loss of habitat for wild animals and there has been insufficient assessment of the Proposed Local Development Plan's environmental impact.

146: Concern over loss of wildlife and flora and fauna. Areas provide wellbeing opportunities.

244: Development removes green space. Development has a negative impact on wildlife, flora and fauna.

Is There a Need for Further Development?

56: The respondent feels that the current economic climate and housing market would demonstrate that there is no need for additional housing development.

146: No requirement for housing. Population is expected to level out.

234: Object to further house building in Aberdeen. There is sufficient housing stock already on the market - this is not selling. Oil and gas industry is in decline, therefore there is no demand for housing.

244: More housing is not required or wanted.

1118: There are many new / in-progress residential development on the periphery of Aberdeen. Note that Aberdeen's population has stayed roughly constant since 2013, so query why all these developments are needed. Note that, when comparing properties listed within a 5-mile radius of their centres, Aberdeen has almost 3 times as many as Edinburgh (2972 properties on ASPC vs 1143 properties on ESPC). This is despite Edinburgh's population being over twice as big. This highlights the over-saturated property market that Aberdeen already has, even without further developments. More thought needs to be given to a city-wide plan to redevelop and reinvigorate the city rather than just building new residential developments on every available site, whether they are needed or not.

Economic Diversification

545, 546, 547, 548: A focus is needed on diversifying the economy away from oil and gas.

887: Vision to 2032 and beyond offers commentary on the region's historic strengths in the oil and gas sector and how it has been an important component of the regional economy. The respondent sets out that, by having an established base of infrastructure and skills in the energy sector, that Aberdeen is rightly placed to aid the national energy transition objectives. The respondent supports the Energy Transition Zone and emphasises its potential in meeting the national aim of Net Zero and also the economic and employment opportunities of such a development.

910: Further text is required in the Proposed Local Development Plan to identify the current reliance on the oil and gas sector, and the significant changes needed to transition to greener energy sources. The Aberdeen Harbour Board Masterplan 2020 identifies the importance of Aberdeen Harbour to regional and national economic success.

910: OP56, OP61, OP62 Proposed local Development Plan paragraph 3.26 - Text needs to be added to allocated/ safeguard land.

Employment Land Supply

572: Objection is made to the strategy to not identify any further employment land. One of the aims of the Proposed Local Development Plan and Aberdeen City and Shire Strategic Development Plan 2020 is to promote the need to use resources more efficiently and effectively whilst protecting assets. The planning system should support sustainable economic growth, regenerations and creation of well-designed sustainable places. This includes redevelopment of brownfield sites.

Allocations made in the Proposed Local Development Plan for business and industrial land for the period to 2032 are large sites. Notes Scottish Planning Policy (paragraph 90) requires allocation of sites to meet diverse needs, sectors and sizes of business. Promotes alternative site (Issue 6) to meet diverse needs of different sectors per Scottish Planning Policy.

690: Questions the need for office employment accommodation.

959: Aberdeen City and Shire Strategic Development Plan 2020 figures do not justify the conversion of OP2 Cloverhill from employment to housing. Its allocation will impact existing infrastructure.

Proposed Policy LR1 – Land Release / Strategic Reserve Land

717: Policy LR1 - The policy is restrictive due to the “refusal” of development. There is uncertainty around the terms used – “development”, “close proximity” and “jeopardises”. In some cases, alternative uses may be required on site; these can add value. The policy would rule out neighbouring windfall sites.

A five-year supply of effective housing land is required at all time. A short fall policy is required to release land without a full review of the Local Development Plan. Currently, Phase 2 sites are the later phases of Phase 1 sites. If Phase 1 sites are not delivering, the Phase 2 elements will not satisfy a shortfall. An alternative mechanism is required. This would be in line with paragraph 30 of Scottish Planning Policy - development plans "positively seek opportunities to meet the development needs of the plan area in a way that is flexible enough to adapt to changing circumstances over time"

717: Strategic Reserve Land / Housing. Previous Plans have provided certainty and understanding for communities and the development industry through the provision of strategic reserve land.

The Aberdeen City and Shire Strategic Development Plan 2020 makes provision for Strategic Reserve Land.

There is an overreliance on non-effective brownfield sites and publicly owned sites that are unlikely to become effective in the Plan period. To ensure a Plan led system, effective sites are required to be identified, and to ensure flexibility strategic reserve site should be identified. The sites identified for development post 2032, are the later phases of Phase 1 sites. If Phase 1 sites are not delivering as anticipated, the post 2032 sites cannot be brought forward. Strategic Reserve sites would provide flexibility and confidence in the Plan led system. This would be in line with paragraph 30 of Scottish Planning Policy - development plans "positively seek opportunities to meet the development needs of the plan area in a way that is flexible enough to adapt to changing circumstances over time"

744: Bid B0906, Land at Contlaw. If part, or none of site is allocated in the period up to 2032, the site or remainder of the site should be identified in Part B of Policy LR1 and safeguarded as future development. This may be done in whole or in part based on the proposed phasing of development.

744: Bid B0210, Mundurno, Bridge of Don. If part, or none of site is allocated in the period up to 2032, the site or remainder of the site should be identified in Part B of Policy LR1 and safeguarded as future development. This may be done in whole or in part based on the proposed phasing of development.

744: Bid B02/11, Newton of Mundurno, Bridge of Don. If part, or none of site is allocated in the period up to 2032, the site or remained of the site should be identified in Part B of

Policy LR1 and safeguarded as future development. This may be done in whole or in part based on the proposed phasing of development.

474: Requests remaining 240 units identified for Period 2 Housing Allowances (2033-2035) be moved to the existing Housing Allowances (2020-2032) in order to provide increased certainty and enable the preparation of necessary consents to ensure delivery. There is demand in the site from both local and national housebuilders.

891: Policy LR1 – Land Release - Consider that infrastructure capacity matters will be relevant considerations at the planning application stage, therefore there is no need for the associated wording contained within the policy. Consider that the proposed negative wording is inconsistent with paragraph 30 of Scottish Planning Policy.

Consider that strategic reserve housing land allocations, with a draw-down mechanism, would offer a suitable mechanism to address instances where there is evidence of under delivery.

897: Policy LR1 – Land Release Policy - the sentence "Development on an allocated site or in close proximity to an allocation that jeopardises the full provision of the allocation will be refused" is unclear and should be deleted. The respondent believes that infrastructure capacity matters will be relevant considerations at the planning application stage and as such the above sentence is not necessary and that its negative wording is not consistent with Scottish Planning Policy.

897: The respondent refers to the Aberdeen City and Shire Strategic Development Plan 2020 and their interpretation that it requires the Proposed Local Development Plan to identify a Strategic Reserve and that the Proposed Local Development Plan has not done this unlike previous Local Development Plans. Such strategic land allocations offer security for land supply and the development industry.

National Planning Framework 3 / National Planning Framework 4

768: Respondent supports the aim of the Proposed Local Development Plan to achieve an energy transition to zero emissions which aligns with Scottish Hydro Electric objectives. Respondent believes there should be greater reference to the support needed for national developments which are defined in National Planning Framework 3 and potentially in National Planning Framework 4. This acknowledgement could be in the form of support for the reinforcement and continued development of the electricity transmission network. Respondent requests emphasis and support in the plan for future upgrades to the high voltage electricity network to ensure security of supply and maintain an enhanced system of energy transmission. Respondent requests that they are identified as part of the Future Infrastructure Requirements Group (FIRS).

887: National Planning Framework 4 refers to the consultation on the National Planning Framework 4 and that candidate national projects should be included in Proposed Local Development Plans. The respondent considers that at the time of their submission a submission was made for the Energy Transition Zone to the National Planning Framework 4 and that the Proposed Local Development Plan should be amended to reflect this.

910: Once the National Planning Framework 4 consultation identifies candidate national developments, and where the Aberdeen Local Development Plan has not yet been adopted, text needs to be added noting these.

Supporting Comments

833: Page 3 - Index of Policy Areas on page 3 is useful and not seen in previous Local Development Plans.

833: Paragraphs 1.1.7 and 1.3.5 - Welcome integration with Aberdeen Health and Social Care Partnership to create links between planning, health and wellbeing.

880: The respondent supports the Proposed Local Development Plan's Vision and Spatial Strategy.

887: Paragraphs 3.20 and 3.26 - supports reference to Aberdeen Harbour South and the Energy Transition Zone as major development areas. The respondent offers some modifications to these paragraphs.

891: In commenting on the Foreword and Vision, welcome that the Proposed Local Development Plan recognises the contribution new housing can make to people health and wellbeing through the delivery of places that are sustainable and healthy. Welcome that the Proposed Local Development Plan acknowledges that, "The creation of places which foster physical and mental health and wellbeing is dependent on policies being considered holistically".

897: Fully support the level of ambition set out in the Vision. The respondent considers that a clear focus on being an engine for growth, job creation, innovation and supporting new development will allow Aberdeen to face other challenges from a position of strength.

897: Aside from issues with other components of the Proposed Local Development Plan the respondent commends Aberdeen City Council on the presentation of this section of the Proposed Local Development Plan. They consider it clear to follow and it is good to see fundamental issues - how much land to allocate and where - prominently positioned and dealt with in detail within the Plan rather than confined to appendices.

910: In commenting on paragraph 2.6 - Support the text relating to Aberdeen South Harbour Board Extension, and the potential of National Planning Framework 4 to support Aberdeen.

910: In commenting on paragraph 3.26 - Support the identification of Aberdeen South Harbour and the Energy Transition Zones as major development areas.

1143: Supports the Spatial Strategy and the focus on brownfield development ahead of greenfield.

1146: In commenting on Section 1, paragraph 1.2 of the Proposed Local Development Plan, the respondent agrees with and supports the Vision for Aberdeen. The New Aberdeen Mosque and Community Centre will make a significant contribution to this.

Net Zero Target

885: In responding to page 10, paragraph 1.1.1 of the Proposed Local Development Plan, note that the Scottish target for achieving net zero should be amended from 2040 to 2045.

Supplementary Guidance / Aberdeen Planning Guidance

891: Note that paragraph 2.8 (page 20) states that the Proposed Local Development Plan has been developed in the context of a new and emerging Scottish planning system, and that it has taken account of all changes to date, for example the removal of statutory Supplementary Guidance. Note however that paragraph 2.11 suggests that reference will be made to Aberdeen Planning Guidance and Supplementary Guidance. Consider that this statement contradicts the previous in relation to the removal of Supplementary Guidance and should be clarified.

Note that there are numerous references to 'Supplementary Guidance' throughout the Proposed Local Development Plan in relation to Developer Obligations and Infrastructure Delivery. Note that page 124 of the Proposed Local Development Plan identifies that Appendix 4 contains Supplementary Guidance on Developer Obligations, which appears to suggest it would form part of the Local Development Plan. Respondent welcomes this, but further clarity is sought.

Consider that Supplementary Guidance and general Aberdeen Planning Guidance should form part of the Local Development Plan as an associated Appendix, as Page 124 of the Proposed Local Development Plan suggests. This should have been made available for comment as part of the consultation.

897: A significant amount of detail is deferred to Aberdeen Planning Guidance and that in some cases important policy tests which should appear in the Proposed Local Development Plan are deferred to this guidance which is not yet available. It is not possible to assess the impact of policies at this stage of the plan process. As a result, some policies will require changes to address these issues. For others it will be important that a draft of the Aberdeen Planning Guidance is provided ahead of the examination so that it is clearer how Aberdeen City Council intends the policy to apply.

900: The respondent considers that the Planning (Scotland) Act 2019 has removed the ability for Supplementary Guidance to be prepared and adopted and forming part of the Development Plan and that the Proposed Local Development Plan has resolved to reserve detail on policy to non-statutory guidance (Aberdeen Planning Guidance), for which there are no standards for engagement on, or review processes for. The respondent is concerned that the Proposed Local Development Plan seeks to rely on these documents heavily and the approach to referencing in the plan appears to be an effort to create a greater status or materiality for this guidance. In many cases the detailed policy to be dealt with is not appropriately dealt with in this manner and should be set out in the Local Development Plan and not non-statutory guidance.

The respondent questions the impact the Proposed Local Development Plan's policies will have on viability. As the policies seek to raise design and quality standards these will have cost implications which could affect economic development, employment and housing delivery. A Viability Assessment of the Proposed Local Development Plan's policies should be considered. There may be a need to reconsider the Council's priorities in the context of Scottish Planning Policy and the Aberdeen City and Shire Strategic Development Plan 2020 in light of such an assessment.

General

833: In commenting on Table 1, page 14, note that graphical presentation would be preferred. This is impossible to use in practice.

Modifications sought by those submitting representations:

Development of the Green Belt / Brownfield Development

4: Stop all out of town developments.

56: Rescind the Proposed Local Development Plan

146: The project vastly reduced or cancelled.

157: Further development on green land stopped. Unused buildings repurposed and refurbished instead.

1137: Do not replace green space with development and relocate housing development sites.

1143: As a key principle all useable brownfield sites should be re-developed before greenfield (Green Belt, other green spaces, etc).

Is there a Need for Further Development?

690: Review Kingswells. Review Energetica.

Economic Diversification

887: Amend paragraph 1.2.2 to state: *“Recognised internationally as a global leader in the oil and gas industry, the influence of this, and its supporting industries, have been considerable over the past four decades. Helping to raise living standards in the city and contributing to average income levels well above the national average, it has also resulted in strong rates of employment and provided opportunities across a range of supporting sectors. However, energy in the Aberdeen City Region (including oil and gas and renewables) accounts for 52% of the national employment in energy. This underscores the dominance of the energy sector but also highlights the degree of vulnerability within the economy as a whole to fluctuation in oil and gas employment. The energy sector contributed £13 billion of GVA to the Aberdeen City Region economy in 2017 and represents almost 72% of the total Scottish GVA generated by the energy sector. This demonstrates the high spatial concentration of, and specialisation in, energy employment present in Aberdeen City Region and the disproportionately high GVA contribution. However, this dominance of energy employment highlights the importance of the diversification of this economy and in particular transitioning into new forms of energy usage”*.

Paragraph 1.2.4 should be amended to state: *“This innovation, in conjunction with the energy sector’s existing expertise, is helping many traditional oil and gas companies move away from fossil fuels to new technologies which are low, or zero carbon. This transition*

process is underway and the Harbour can act as a catalyst for the Regional economy to ensure its long term resilience”

After paragraph 1.2.4 add the following additional paragraphs: “The recent expansion at South Harbour offers a once in a generation opportunity to establish a port-centric cluster of high value jobs and create a new Energy Transition Zone to reduce the dependency on oil and gas, and diversify the economy, whilst utilising and retaining the Region’s high value skills. This transition will help to position the City Region towards decarbonisation through offshore renewables, new forms of energy and storage, new technology and innovation, establishing Aberdeen as Europe’s Energy City”. Expansion of the port will bring about a step-change in the value of trade to the Region across a range of sectors making a significant contribution to the regional and national economy post- Brexit. This opportunity means that Aberdeen is well placed to capitalise on this energy transition and has already seen significant investment in the sector. In order to protect the regional economy and realise the economic potential, within this plan we have identified our first Energy Transition Zone, a land use zoning and supporting policy specifically aimed at supporting the delivery of low and zero carbon technologies, placing Aberdeen at the forefront of this emerging industry. Initial phases of the Energy Transition Zone have been placed adjacent to Aberdeen’s South Harbour Extension and the rail line to maximise the development opportunities.”

887: In responding to paragraphs 3.20 and 3.26, amend the second sentence of paragraph 3.26 to read *“The Plan also identifies land adjacent to Aberdeen South Harbour for a new Energy Transition Zone”*. The respondent also requests a modification to change the City Wide Proposals Map to include Scottish Transport Appraisal Guidance (STAG) options to protect the land from other development which may prevent its delivery.

910: The respondent wishes to add the following text to the end of paragraph 1.2.2:
“However, energy in the Aberdeen City Region (including oil and gas and renewables) accounts for 52% of the national employment in energy. This underscores the dominance of the energy sector but also highlights the degree of vulnerability within the economy as a whole to fluctuation in oil and gas employment.

The energy sector contributed £13 billion of GVA to the Aberdeen City Region economy in 2017 and represents almost 72% of the total Scottish GVA generated by the energy sector. This demonstrates the high spatial concentration of, and specialisation in, energy employment present in Aberdeen City Region and the disproportionately high GVA contribution. However, this dominance of energy employment highlights the importance of the diversification of this economy and in particular transitioning into new forms of energy usage.”

The respondent wishes to amend paragraph 1.2.4 to state:

“This innovation, in conjunction with the energy sector’s existing expertise, is helping many traditional oil and gas companies move away from fossil fuels to new technologies which are low, or zero carbon. This transition process is underway and the Harbour can act as a catalyst for the Regional economy to ensure its long-term resilience.”

The respondent wishes to add the following additional paragraphs:

“The recent expansion at South Harbour offers a once in a generation opportunity to establish a port-centric cluster of high value jobs and create a new Energy Transition

Zone to reduce the dependency on oil and gas, and diversify the economy, whilst utilising and retaining the Region's high value skills. This transition will help to position the City Region towards decarbonisation through offshore renewables, new forms of energy and storage, new technology and innovation, establishing Aberdeen as Europe's Energy City.

Expansion of the port will bring about a step-change in the value of trade to the Region across a range of sectors making a significant contribution to the regional and national economy post-Brexit.

This opportunity means that Aberdeen is well placed to capitalise on this energy transition and has already seen significant investment in the sector. In order to protect the regional economy and realise the economic potential, within this plan we have identified our first Energy Transition Zone, a land use zoning and supporting policy specifically aimed at supporting the delivery of low and zero carbon technologies, placing Aberdeen at the forefront of this emerging industry. The Energy Transition Zone has been placed adjacent to Aberdeen's South Harbour Extension and the rail line to maximise the development opportunities."

910: The respondent wishes to amend paragraph 3.26 to read:

"South of the River Dee, Loirston is identified to accommodate a new community. The other major development in this area is the Aberdeen South Harbour. The Plan also identifies land adjacent to Aberdeen South Harbour for a new Energy Transition Zone and safeguards additional land with potential to support the future growth requirements of Aberdeen South Harbour. Further details of this can be seen in Policy B5."

Proposed Policy LR1 – Land Release / Strategic Reserve Land

717: The respondent wishes to delete the text that says: – *"Development on an allocated site or in close proximity to an allocation that jeopardises the full provision of the allocation will be refused"* (Part A) and *"Development on a site allocated in these phases or in close proximity to an allocation that jeopardises the full provision of the allocation will be refused"* (Part B)

The respondent considers that the Policy should also include a mechanism for bringing forward additional housing land should a shortfall in the Housing Land Supply be identified (see also separate representations relating to Strategic Reserve Land).

717: Provision should be made for Strategic Reserve Land. Greenfield sites with development potential should be removed from the Green Belt to provide opportunities for future growth should there be a need to augment the Housing Land Supply.

474: First sentence of paragraph 3.13 should be modified to reflect the allocation of 240 units at Rowett South within the 2020-32 allowances. It should read: *"We will continue to identify 3,100 homes at Greenferns, Greenferns Landward, Grandhome and Newhills which the 2017 Local Development Plan identifies for its Phase 2"*.

Policy LR1 Part B - Housing and Employment Land for the period 2033-2040 should also be modified to remove reference to OP21 Rowett South - 240 homes, to reflect the 240 units instead being identified as part of the Proposed Local Development Plan's existing allocations.

Appendix 2 - 'Other Factors' text should be amended to remove "...of which 240 homes are phased in the period beyond 2032". It should instead read "...Opportunity for 1940 homes. Part of approved Newhills Development Framework. Town Centre identified for this site comprising of approx. 7,500 square metres total floorspace (4,000 square metres supermarket, 3500 square metres other comparison and local shops and retail services.)"

859: Bid Site B0219 – Amend the Proposed Local Development Plan so that Perwinnes (B0219) should be allocated as future strategic reserve housing land for 3,000 to 4,000 new homes and mixed-use.

891: The following sentence, contained in both Parts A and B of the policy, is unclear and should be deleted: "*Development on an allocated site or in close proximity to an allocation that jeopardises the full provision of the allocation will be refused.*"

Additional wording should be added to allow for an appropriate draw down mechanism should any issues arise with maintaining a five year effective Housing Land Supply, for example: "The Council, developers, service providers and other partners in housing provision should work together to monitor the supply of effective land necessary to deliver housing, taking a flexible and realistic approach. If a shortfall in the 5-year effective housing supply emerges, the Council will consider the early draw down of allocated sites which are identified as safeguarded for future development (2033-2040)".

897: Policy LR1 – Land Release should be modified to include the following subject: "*The Council, developers, service providers and other partners in housing provision should work together to monitor the supply of effective land necessary to deliver housing, taking a flexible and realistic approach. If a shortfall in the 5-year effective housing supply emerges, the Council will consider granting planning permission for unallocated housing sites which can be demonstrated to be sustainable.*"

900: The Proposed Local Development Plan should be modified as the Spatial Strategy does not appropriately distribute housing allowances to ensure that the strategy and housing demand and need is met. The allocation of additional land at Derbeth, Kingswells would address shortcomings in the strategy and meet shortfall in housing allowances.

The respondent requests that Policy LR1 Part A should be modified to read "*Housing and employment development on sites allocated in the period up to 2032 will be approved in principle within areas designated for housing or employment. Development on allocated sites or close to them must ensure that where there are future phases of development access is planned for future phases to ensure that the allocation can be delivered in full.*"

The respondent requests that Policy LR1 Part B should be modified to read "*Housing and employment development on sites allocated in the period 2033-40 are safeguarded for future development and will contribute towards future housing requirements. Development on allocated sites or close to them must ensure that where there are future phases of development access is planned for future phases to ensure that the allocation can be delivered in full. The housing and employment land sites for the period 2033-40 are as follows;*"

The respondent considers the Proposed Local Development Plan should be modified to identify allocations that could contribute to the Period 2 and Period 3 allowances and it is suggested that paragraph 3.13 of the Proposed Local Development Plan is removed and it

is replaced with a table of sites, including those existing sites that will or could contribute to these future Periods.

National Planning Framework 3 / National Planning Framework 4

768: Support low carbon and transmission infrastructure. There should be reference to further supporting the development of the transmission network as outlined in National Planning Framework 3.

887: With reference to the draft National Planning Framework 4 the respondent requests that the Energy Transition Zone be recognised as a candidate National Development in the Proposed Local Development Plan.

910: Add paragraph 2.5 which states:

“The following national development(s) have been identified in the emerging National Planning Framework 4 for Aberdeen as they are considered as being potentially essential to Aberdeen and Scotland’s regional and national success. [Include a list of any identified National Developments]. Once adopted National Planning Framework 4 will identify the nationally important allocations and planning applications must accord with National Planning Framework 4 and Aberdeen Local Development Plan unless material considerations indicate otherwise”.

Supporting Comments

Other Issues

885: Amend page 10, paragraph 1.1.1 of the Proposed Local Development Plan to “Scotland has set an ambitious target of achieving NetZero by 2045 and reducing its emissions by 75% by 2030.”

905: Include clarification that the Proposed Local Development Plan will be reviewed after five years.

1145: The Proposed Local Development Plan should include clarification that the Plan will be reviewed after 5 years (in line with the current legislative requirements).

Supplementary Guidance / Aberdeen Planning Guidance

891: The respondent notes that a significant amount of policy detail appears to be deferred to Aberdeen Planning Guidance. They consider that this should form part of the Proposed Local Development Plan as it impacts on the implications of the Proposed Policies which are overly generic. This detail should therefore be open to the same scrutiny as the primary policies and made available for consultation.

900: With regard to the use of Aberdeen Planning Guidance, the respondent requests that the Proposed Local Development Plan is modified to incorporate the relevant policy provisions from proposed Aberdeen Planning Guidance to ensure that there is appropriate scrutiny of the policies that will guide development.

With regard to policy viability, the respondent requests that the Council undertake a review on the deliverability of development and the policy expectations.

Summary of responses (including reasons) by planning authority:

Development of the Green Belt / Brownfield Development

4, 146, 157, 234, 629, 900, 924, 1137: The function of Proposed Local Development Plan Policy NE1 Green Belt is to maintain the distinct identity of Aberdeen and the surrounding areas by clearly defining their boundaries. The Policy safeguards Green Belt land to help avoid coalescence of settlements and sprawling development on the edge of the city, maintaining Aberdeen's landscape setting and providing access to open space. It also directs development to the most appropriate locations such as allocated sites and brownfield sites in the urban area. The Policy offers strong protection of the Green Belt from inappropriate development in line with paragraph 52 of Scottish Planning Policy (CD XX).

Green Belts are generally permanent, but their boundaries are not static. Each new Local Development Plan has changed Green Belt boundaries in order to accommodate the greenfield development requirements of the time. The Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) states in paragraph 4.18 that: *"New allocations should consider opportunities to reuse brownfield land and attempt to utilise the current "constrained" supply in the first instance. However; it is likely that some new development will need to take place on greenfield sites in order to help deliver our Vision and future strategy for growth. 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."*

This is the approach the Council took in identifying the housing allocations in the Proposed Local Development Plan. The Proposed Local Development Plan Spatial Strategy explains (in paragraphs 3.4 to 3.8) that even after taking into consideration brownfield and constrained sites, further housing allocations would still be needed in order to meet the requirements of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The advantage of identifying ample greenfield housing and employment land to take us through to 2032, and possibly beyond, is that it should reduce the need to make large scale changes to the Green Belt for the foreseeable future. This will help to promote a feeling of permanence. Those areas which continue to play a vital role in protecting landscape setting and providing open space for recreation remain zoned as Green Belt.

Environmental Impacts of Development

56, 146, 244: The response above explains the need to identify greenfield and Green Belt areas to accommodate the development required by the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). In doing so, a Development Options Assessment (CDXX) was carried out which allowed development proposals and 'Bid Sites' to be assessed in order to identify the most suitable areas for development. A range of criteria were used to assess sites, including environmental issues such as habitats, protected species, nature conservation and landscape features.

Nevertheless, it is recognised that any new site is likely to have some negative impacts associated with its development. Because of this, a Strategic Environmental Assessment

(CDXX) has also been carried out and the outcome of this was used, alongside the Development Options Assessment (CDXX), to come to a decision on which sites were suitable for development. The findings of the Strategic Environmental Assessment (CDXX) are included within an Environmental Report (CDXX), which was published alongside the Proposed Local Development Plan. The Strategic Environmental Assessment (CDXX) on its own does not tell us whether a site is suitable for development or not. The assessments do however provide a wealth of information which allows us to reach a view on each site. The assessments can also help to highlight possible mitigation measures which could be carried out on particular sites in order to make what might be an otherwise unsuitable development acceptable.

In these ways, environmental issues were taken into account in making the allocations. And where negative impacts were identified, the Environmental Report (CDXX) highlights mitigation to reduce the impacts.

Is There a Need for Further Development?

56, 146, 234, 244, 1118: The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) sets a clear strategy for development in Aberdeen, which includes the housing and employment land allowances to be delivered through Local Development Plans.

The Planning etc. (Scotland) Act 2006 requires Local Development Plans to be consistent with the approved Strategic Development Plan, which in this case is the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). It is therefore not possible to depart with any degree of significance from the requirements of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) in terms of housing and employment land allocations.

We recognise that meeting housing and population targets also depends on factors that are not related to the Development Plan, including the state of the economy and, particularly in Aberdeen, the price of oil. However, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) Spatial Strategy has been approved and the Proposed Local Development Plan identifies Aberdeen's contribution towards that. This ensures that the Proposed Local Development Plan can cope with higher levels of demand than we currently expect.

The Housing Need and Demand Assessment 2017 (CDXX) is the correct vehicle for addressing these issues, not the Local Development Plan. Development Plans need to provide certainty for developers, agencies, infrastructure providers and the public. Constantly reacting to variations in census data (either up or down) would not achieve this. There will however, be a review process which will take place through the emerging National Planning Framework 4. This is likely to encompass a revised Housing Need and Demand Assessment and this can factor in emerging evidence of economic and housing market performance. This will subsequently feed into the next Local Development Plan.

Economic Diversification

545, 546, 547, 548: We agree that Aberdeen needs to diversify the economy away from oil and gas. The Vision of the Proposed Local Development Plan mentions its role in delivering projects related to energy transition and a low and zero carbon economy. Other parts of the Plan look to support areas such as the City Centre, tourism, regeneration and existing retail, commercial and other industries. Diversifying the economy will also depend

on other strategies and projects including the City Region Deal (CDXX) and Regional Economic Strategy (CDXX). Our Plan looks to support these initiatives through identifying specific proposals (such as the Energy Transition Zone) and providing policy advice and guidance on the use of land (such as in the City Centre and business areas).

887, 910: Whilst we can appreciate the detailed background to much of what is said in the text amendments suggested to sections 1.2 and paragraph 3.26 of the Proposed Local Development Plan, we also want to ensure the Plan is as concise as possible. The Vision section covers all major planning related issues, and already recognises Aberdeen's reliance on the oil and gas sector and the need to transform its economy to low and zero-carbon energy alternatives. The Energy Transition Zone will play an important role in this and this is acknowledged in the text. The balance of discussion of issues in these sections is considered appropriate and we would not commend any further changes.

887: With reference to changing the Proposals Map to include the Scottish Transport Appraisal Guidance (STAG) access option to the Harbour. A Local Development Plan Proposals Map is not the place to identify 'options' that may or may not be delivered. Local Development Plans are meant to provide certainty for both the public and development industry. The Scottish Transport Appraisal Guidance (STAG) process should be completed and a preferred route would need to be identified before it could be considered for inclusion in a Proposed Local Development Plan

Employment Land Supply

572, 959: It is acknowledged that the next Local Development Plan is required to maintain a marketable supply of employment land of 60 hectares at all times, as set out in the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The employment land allocations are set out in Table 4 of the Proposed Local Development Plan.

Appendix 2 of the Employment Land Audit 2019 (CDXX) sets out the overall position of employment land supply in Aberdeen City. Even with 24.8 hectares of land removed through the re-allocation of Cloverhill, there still remains 249 hectares in the established supply and 185 hectares in the marketable supply.

The development rates for employment land in Aberdeen can be seen in Appendix 5 of the Employment Land Audit 2019 (CDXX). This shows an average annual development rate of 6.8 hectares over the last 14 years, with the highest annual figure standing at 17 hectares developed in 2013/14. This shows there is more than enough employment land in the supply to cope with even the highest historical employment land development rates for the lifetime of the next Local Development Plan.

Table 4 of the Proposed Local Development Plan does not include further employment land areas around Bridge of Don and Dyce, much of which remains undeveloped. At Dyce, OP23 Dyce Drive (65 hectares) is not included. In Bridge of Don the land at OP45 Berryhill is not included in this table but comprises 43.7 hectares of employment land which is in addition to the allocated sites. There is a substantial further allocation of 16.4 hectares at OP3 Findlay Farm as well as the 27.8 hectares of Strategic Reserve identified at OP1 Murcar. This is in addition to the existing areas of employment land at Bridge of Don, Denmore and Murcar industrial areas and the energy park south of Findlay Farm. In Dyce there are further industrial estates at Kirkhill, Wellheads and Raiths. This means that there is a very generous supply of employment land in both the Dyce and Bridge of Don areas even after the re-allocation of Cloverhill.

690: The Proposed Local Development Plan has not allocated any further business and industrial land over that already identified in the Aberdeen Local Development Plan 2017 (CDXX). As mentioned above, 24.8 hectares of unused business and industrial land at Cloverhill has been re-allocated to housing. It is however important to maintain a supply of employment land in Local Development Plans to cover future needs. That supply should be generous to ensure that any future upturns in the economy can also be accommodated.

Proposed Policy LR1 – Land Release/ Strategic Reserve Land

717, 744, 891, 897: Policy LR1 of the Proposed Local Development Plan is concerned with land release. Some representations argue that it should include a clause regarding the maintenance of a five-year effective Housing Land Supply and the drawing down of additional land in the event of a shortfall in the land supply. There is no requirement in Scottish Planning Policy (CDXX) that such policies need be included in Local Development Plans. Paragraph 119 of Scottish Planning Policy expects that the housing land requirement is met through allocations in the plan rather than through policy mechanisms. Issue 2 on Housing Land Supply shows that Aberdeen has a healthy effective land supply, and the likelihood of any shortfall emerging in this supply is low. For this reason, there is no need to include a policy mechanism addressing the scenario of a potential shortfall.

There is no need to identify strategic reserve land for similar reasons. Although the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) makes reference to strategic reserve land in paragraph 4.20, it also states that it is not a requirement. Besides, some of the sites already identified are very large, and their development is likely to continue well beyond the 5 year lifespan of this Plan. The masterplanning of these sites helps to provide future certainty of developers and local communities.

For these reasons we would not intend to identify Strategic Reserve land at Bid Sites B0906 Land at Contlaw, B0219 Perwinnes, B0210 Mundurno or B0211 Newton of Mundurno. The Contlaw site is considered in Issue 12: Alternative Sites Deeside. Perwinnes and the two Mundurno sites are looked at in Issue 4: Alternative Sites Bridge of Don/Grandhome.

Regarding the need for Part B of the policy relating to Phase 2 development, it is the Council's intention to reserve these sites until at least the next review of the Local Development Plan, in order to avoid piecemeal development. We would also wish to retain the references in this policy to refusing development that jeopardised the full provision of an allocation. This will help to safeguard the allocated sites from other incompatible uses, and to ensure that the sites will contribute towards meeting the housing supply target in the future. The policy does not automatically rule out neighbouring windfall sites if they are likely to be compatible with future anticipated uses.

474: The Proposed Local Development Plan has to be consistent with the approved Aberdeen City and Shire Strategic Development Plan 2020. The Aberdeen City and Shire Strategic Development Plan 2020 defines the housing allowances that Local Development Plans are required to fulfil. Issue 2 - Housing Land shows that there is ample housing identified to meet the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) Phase 1 allowances and there is no need to add to these.

National Planning Framework 3 / National Planning Framework 4

768: Support for the development of low carbon and transmission infrastructure is noted and welcomed. However further reference to this issue, as outlined in National Planning Framework 3 (CDXX), is considered unnecessary. This is a regional issue that is more suitably expressed in a Strategic Development Plan or Regional Spatial Strategy. There is also no need to repeat National Planning Framework 3 (CDXX), and even less so the emerging National Planning Framework 4, which once approved will have enhanced status in terms of development planning.

887, 910: The current wording of the Proposed Local Development Plan at paragraph 2.4 reflects the current situation. We acknowledge the logic of attempting to future-proof the Proposed Local Development Plan wherever possible, however we would not wish to anticipate the possible contents of a finalised National Planning Framework 4 until it has been published and approved by the Scottish Parliament.

Supporting Comments

833, 880, 887, 891, 897, 910, 1143, 1146: Supporting comments are noted and welcomed.

Net Zero Target

885: We accept this is as a typographical error and will change the reference to 2045.

Supplementary Guidance / Aberdeen Planning Guidance

891: To clarify the statement in Proposed Local Development Plan paragraph 2.11, it is our intention to take forward only one Supplementary Guidance as part of this Plan, and this is the Planning Obligations Supplementary Guidance (CDXX). All other policy areas currently covered by Supplementary Guidance will be carried forward as non-statutory 'Aberdeen Planning Guidance'. The process for producing and adopting Aberdeen Planning Guidance will be the same as is currently used for Supplementary Guidance, with the exception that it will not be sent to Scottish Ministers for approval.

717, 891, 897, 900: The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in non-statutory Aberdeen Planning Guidance, which will replace existing Supplementary Guidance to the extant Local Development Plan in almost all instances. The Proposed Local Development Plan provides details of some of the issues which will be covered by Aberdeen Planning Guidance underneath the corresponding policy.

Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no locus on these matters. The final and detailed contents of Aberdeen Planning Guidance will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that stakeholders will be able to comment at the appropriate level of policy detail at the appropriate time.

900: In terms of quality and viability, it needs to be borne in mind that once a development is built, it is likely that we will have to live with it for a long time. High quality developments

and good design can have a positive impact on wellbeing and the economy in general. The Council is willing to look at viability issues where necessary, however this should not be allowed to result in poor quality developments.

833: The Table on page XX of the Proposed Local Development Plan shows which policies support the stretch outcomes of the Council's Local Outcome Improvement Plan (CDXX) and is for illustrative purposes only.

Reporter's conclusions:

Reporter's recommendations:

Issue 2	HOUSING LAND	
Development plan reference:	Section 2, pages 23-24, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Graeme Paterson (13) Sarah Wingrove (21) Richard Nixon (545) Avril Nixon (546) Cameron Nixon (547) Matthew Nixon (548) Stewart Milne Homes (717) Barratt North Scotland (781) Drum Property Group (859) Bancon Homes (862) Scottish Government (885) Barratt North Scotland (891) CALA Homes (North) Ltd (895) Homes for Scotland (897) CALA Homes (North) Ltd (900) The Grandhome Trust (959) Ademola Isaac (1103) Tracey Isaac (1104) Tiffany Parsons (1109) Callum Abbey (1111) Thomas Steven Kilpatrick (1113) Neil Palmer (1116) Catherine Palmer (1121) Francess O Kane (1122) Penelope Cogle (1124) Mr Kenneth MacAskill (1125) Nicola Allan (1127) Mrs S Kerr (1130)</p>		
Provision of the development plan to which the issue relates:	Makes provisions for brownfield and greenfield housing allocations	
Planning authority's summary of the representation(s):		
<p><u>Housing Land</u></p> <p>717, 859: There is a shortfall in the housing land allocations and additional sites are required to conform with the Aberdeen City and Shire Strategic Development Plan 2020. Sufficient land had not been brought forward to ensure confidence that it can be delivered in the Plan period.</p>		

885: The Housing Numbers in the Proposed Local Development Plan should be set out differently. The housing numbers should follow those set in the Aberdeen City and Shire Strategic Development Plan 2020 and indicate tenure, functional housing market area, generosity of the Housing Land Requirement. The Plan should also set out that it would maintain an effective 5-year supply at all times.

891: Note that the Proposed Local Development Plan has been prepared in the context of the Aberdeen City and Shire Strategic Development Plan 2020. Concern over the status of the Housing Land Supply within the City and consider there to be a lack of clarity (e.g. through a clear and concise tabulated format) in demonstrating how greenfield and brownfield allocations within the Proposed Local Development Plan are envisaged to meet the Aberdeen City and Shire Strategic Development Plan 2020 allowances.

895: Concern that the housing strategy adopted does not align with Aberdeen City and Shire Strategic Development Plan 2020 ambitions or requirements. The additional housing allocations post the Aberdeen City and Shire Strategic Development Plan Examination findings are welcome, but do not deliver enough additional housing to create a robust set of allocations that will deliver the ambitious and aspirational vision for growth set out in the Aberdeen City and Shire Strategic Development Plan 2020. A number of appendices are attached to the submission.

The approach to identifying new housing land allocations has resulted in concentrated clusters within parts of the city, e.g. around Bridge of Don and Peterculter. Concerned about the ability of the market to deliver at a pace needed due to the concentration of these new sites in limited geographic areas. This approach has left large areas with little to no new provisions for housing land, including in Cults. In the A93 corridor existing allocations will complete early in the plan period, meaning no new housing would be delivered within Cults later in the Proposed Local Development Plan period. It is essential that a variety in the type, size and ownership of sites is identified to meet the additional requirements set out in the Aberdeen City and Shire Strategic Development Plan 2020. There is therefore a strategic need to identify additional land which should include the Friarsfield North (B0910) development opportunity.

895: Supports the Homes for Scotland response. The Homes for Scotland response reviews in more detail sites and the Council's Brownfield Urban Capacity Study and suggests that the need for additional housing land to be identified in the Plan could be even more acute with a potential shortfall of land for 2,663 homes overall across the whole Plan area.

897: Through paragraph 3.7 of the Proposed Local Development Plan, the Council has misled itself and has therefore taken an overly simplistic approach to meeting the housing allowances of the Aberdeen City and Shire Strategic Development Plan 2020. The respondent refers to paragraph 119 of Scottish Planning Policy and argues that the Council has not demonstrated how the sites which it has allocated will be delivered over the period of the Proposed Local Development Plan.

The respondent refers to their methodology for the calculation for future effective land supply and asserts that this was considered robust due to a reference to it in the Report of Examination into the Proposed Aberdeen City and Shire Strategic Development Plan 2018 (Issue 14, paragraph 26). The respondent argues that a similar exercise should be undertaken in the context of the Proposed Local Development Plan.

The respondent summarises and offers their interpretation of the Housing Land Supply allocated in the Proposed Local Development Plan to meet the Housing Allowances set in the Aberdeen City and Shire Strategic Development Plan 2020. These allocations will not be sufficient to meet the allowances set in the Aberdeen City and Shire Strategic Development Plan 2020. Refers to Planning Advice Note 2/2010: Affordable Housing and Land Audits and questions the deliverability or plan of disposal of some of these sites given a large proportion are in Council or NHS ownership. While the respondent does not endorse the Council's stated figures they have analysed them to inform their response. The respondent considers that the Council needs to demonstrate the effectiveness of and a plan of delivery for the allocated sites (with emphasis on public ownership).

The respondent focuses on the new allocations figure of 1,604 homes in their analysis. It is unclear which greenfield sites in the extant Local Development Plan, but not in the Aberdeen City and Shire Housing Land Audit, the Council intends to rely on as this does not appear to be set out in the Proposed Local Development Plan.

897: The respondent asserts that this amounts to a land supply counting towards the allowances of 2,444, a shortfall of 2,663 homes and that this shortfall needs to be addressed with the allocation of new effective housing sites.

900: The respondent considers that the Spatial Strategy is flawed as it focuses too greatly on a substantial number of small brownfield sites which there cannot be confidence in delivery. Therefore, there should be consideration of the allocation of greenfield sites to complement the supply of housing land.

Deliverability of Sites

717: Concerns regarding the deliverability and effectiveness of new sites allocated. 63% are in public ownership, there has been no demonstration they have been declared surplus (required by Planning Advice Note 2/2010: Affordable housing and land audits), with no unit numbers attached in many instances. Sites may not be delivered, there is a lack of variety and choice over location which may prevent market housing. This is contrary to Scottish Planning Policy. Tillyoch (OP53) and Royal Devenick Park (OP46) were introduced at Full Council, contrary to officers' recommendation and without justification. Appendix of the submission considered the new sites and their potential deliverability. It must be demonstrated these sites can be delivered in the life of the Plan.

859: The respondent offers a comparison of anticipated housing land completions versus actual completions. The respondent asserts that there has been a historic under delivery and considers this justification for additional allocations of greenfield sites.

In addition, larger strategic sites have been under delivering and therefore an additional strategic reserve of sites needs to be allocated. This reserve could be used to draw down additional housing sites which could make up for the short term failure of larger sites delivering (see Issue 1 - Spatial Strategy).

862: The respondent sets out that Bid sites B0938, B0939, B0943, B0314 and B0315 are required in order to meet the housing allowances required from the Aberdeen City and Shire Strategic Development Plan 2020 and help to off a greater housing mix. The respondent states that a high proportion of the brownfield sites used to meet these allowances are owned by the Council or NHS and are unlikely to be delivered within the

Plan period. The brownfield / Brownfield Urban Capacity Study sites are constrained and unlikely to be delivered within the Plan period. The level of density for these brownfield sites is unrealistic. The respondent also questions the effectiveness of the allocated sites in the Proposed Local Development Plan in relation to Planning Advice Note 2/2010: Affordable Housing and Land Audits.

895: Evidence from Housing Land Audits on actual delivery versus predicted delivery suggest further allocations for housing land are necessary to ensure a five-year Housing Land Supply throughout the life of the Proposed Local Development Plan. Evidence from Housing Land Audits suggest a realistic projected delivery rate that is consistently less than that shown year on year. Over a five year average the difference is significant – 24% less year on year which, if applied to the five years between 2020 and the start of 2025, this would reduce the scale of deliverable housing from existing allocated and consented sites by almost 1,400 homes. If extrapolated over the first 12 years of the Plan that shortfall will be significantly greater. The average potential difference in delivery between 2015 and 2024 (a combination of actual and predicted shortfalls) would be in the region of 250 homes each year or 3,000 over the 12 years to 2032. Applying that to the Aberdeen City and Shire Housing Land Audit 2019 future years prediction produces a potential shortfall almost 1,400 homes over the next five years. The Council should either allocate additional housing sites to make up the expected shortfall or include strategic reserve housing land and a draw-down mechanism as a backstop in case of under-delivery – a combination of both may be the best means.

These two elements (over-reliance on brownfield sites and delivery trend evidence from Housing Land Audits) suggest that the current Housing Land Supply proposed by the Proposed Local Development Plan is highly risky and, based on actual past performance, unlikely to meet Aberdeen City and Shire Strategic Development Plan 2020 requirements. The respondent suggests that past delivery performance comparisons against expectations, proven through agreed Housing Land Audits, should be a consideration when allocating an overall Housing Land Supply to ensure that Strategic Development Plan requirements are met. The focus should be on deliverability and the Proposed Local Development Plan should be considering that aspect more fully.

The housing strategy should take greater cognisance of delivery rates of larger strategic sites in their housing strategy and allocate alternative sites where housing delivery is predicted to be slower than anticipated. Evidence suggests strategic larger sites have not delivered as expected over the years. The timescales for getting larger strategic sites on the ground and delivering homes needs to be extended to properly address constraints, ownership complexities, planning and infrastructure requirements, as large sites are generally more complex.

Relying on sites that will deliver slowly over the years will exacerbate housing backlog issues. Increased delivery will only be achieved by allocating additional and deliverable housing sites of a range and scale of sizes and in different locations, potentially including areas for future growth (Strategic Reserve).

900: The respondent questions the allocation of constrained sites in the Proposed Local Development Plan and whether these will be effective within the life of the Plan period. The respondent refers to the Aberdeen City and Shire Strategic Development Plan 2020 and their interpretation that it requires the Proposed Local Development Plan to identify a strategic reserve and that the Proposed Local Development Plan has not done this unlike

previous Local Development Plans. Such strategic land allocations offers security for land supply and the development industry.

Brownfield Urban Capacity Study

545, 546, 547, 548: Brownfield sites report is inadequate as it does not consider empty homes in Aberdeen or redevelopment of industrial sites in residential use.

717: Significant reliance is placed on the Brownfield Urban Capacity Study to meet housing allowances. An annual review of the Brownfield Urban Capacity Study is required, in conjunction with the Aberdeen City and Shire Housing Land Audit. This will allow full debate and scrutiny.

Do not agree with the figures presented in the Brownfield Urban Capacity Study. There is scope for around 400 homes to come forward. Evidence is required to demonstrate what can be delivered in the Plan period. There has been an over emphasis on delivery, a number of the sites have been present for a number of years and remain constrained with the removal of constraints unknown, as is noted in the Aberdeen City and Shire Housing Land Audit 2019.

A number of sites are within the extant Local Development Plan 2017, have not been developed, are not considered effective, and are not new sites. They should not count towards the housing allowance.

781: Respondent makes comments regarding paragraphs 3.7 and 3.8 and Appendix 1 Brownfield Sites. Respondent details calculations and argues that the Council are required to allocate a further 2,742 homes prior to submission for Examination.

859: The respondent asserts that the Proposed Local Development Plan is overly reliant on brownfield sites in order to meet the Housing Land Allowances of the Aberdeen City and Shire Strategic Development Plan 2020. The respondent also challenges the deliverability of brownfield sites generally.

885: The respondent does not consider there to be enough information as to how brownfield land will contribute to the effective land supply.

895: Concerns with the approach to housing land include: over-reliance on brownfield sites and achieving the maximum density from those; over-reliance on larger strategic sites delivering at the rate projected; an inability to draw-down from alternative sites should housing delivery fall behind; a large proportion of urban capacity sites are smaller than 1 hectare raising questions about what the market is for development opportunities of this size; and site-specific issues that suggest a lower than anticipated contribution.

Of the new allocations made (1,258 units), brownfield sites make up 75% of the allowances. This figure is too high and will undermine delivery of the Aberdeen City and Shire Strategic Development Plan 2020 housing allowances, as brownfield sites are often more difficult and take longer to deliver. A broader mix of sites (greenfield and brownfield) should be identified.

The housing strategy relies too heavily on brownfield development and has over-estimated the potential from such sites. Indicative density ranges in the Brownfield Urban Capacity Study adopt the maximum density for a site. This presents an overoptimistic view of

potential brownfield site capacities. The suburban and rural densities in the Indicative Density Range are significantly greater than what is being delivered in practice. The brownfield figure of 3,807 units in the Proposed Local Development Plan therefore seems to be an overestimate. Generally, developers will look to maximise development on a brownfield site so the Average Density outcome is probably closest to the actual deliverable brownfield supply. Brownfield sites are also notoriously difficult to predict and fund. Relying too heavily on brownfield will result in less housing being delivered than required and potentially planning by appeal further into the plan period. Additional housing allowances are required for at least another 1,000 homes, plus a further allowance for a more realistic view on projected site-specific delivery. The latter could be similar to the headroom proposed in the Proposed Local Development Plan Examination of 20%. That could be in the region of 560 (20% of 2,807 i.e. the reduced brownfield expected delivery).

897: The respondent reviews in detail the brownfield component of allocations and their supporting evidence and asserts that many of the sites within the Brownfield Urban Capacity Study are previous allocations or have been identified in previous Aberdeen City and Shire Housing Land Audits. The respondent does not consider that this is consistent with the purposes of the allowances to include sites which have previously been made available for housing as new sites contributing to meeting the allowances. The respondent offers interpretations that: 1. a high proportion of the sites (79% by identified dwelling capacity) appear to have been identified as available for housing in previous Local Development Plans or Housing Land Audits. 2. That 71% of the sites identified are less than 1 hectare in size.

The respondent states that for many of their members these sites would not be attractive as they are too small and that the Brownfield Urban Capacity Study does not consider if there is market demand for such sites.

The respondent queries the use of the phrase 'up to' before the figure of 3,807 as they consider it raises questions over the level of confidence the Council has over the delivery of the supply it identifies.

Reference is made to the scenarios for potential delivery on Brownfield Urban Capacity Study sites and the respondent queries why the Council has used the high scenario to inform the Proposed Local Development Plan's housing allocations. The respondent asserts that the Brownfield Urban Capacity Study is more related to potential than capacity and questions the depth of the study and as such the respondent cautions the potential delivery of brownfield sites. The respondent links the Brownfield Urban Capacity Study to the Aberdeen City and Shire Housing Land Audit 2019 and that its sites were marked as constrained and asserts that this is double counting. The respondent believes that these sites have already been discounted from meeting the Housing Land Requirement by the Reporters who held the Examination into the Aberdeen City and Shire Strategic Development Plan 2020 when assessing what outstanding allowances remained to be met.

900: The respondent reviews in detail the brownfield component of allocations and their supporting evidence within the Brownfield Urban Capacity Study. The respondent queries the methodology and scenarios used to anticipate future delivery on brownfield sites. The respondent queries the Council's housing numbers for brownfield sites and considers that they do not take into consideration the requirements and complexities of delivering specific sites such as open space or flood mitigation which could reduce these numbers. Through the respondent's analysis they consider that there is a shortfall of approximately 1,000

homes through the dependency of the Proposed Local Development Plan on brownfield sites and the questioned method to calculate allocations on brownfield sites. The respondent also notes that 71% of the brownfield sites are under less than 1 hectare and therefore may not be viable to deliver.

1156: Strong support for the focus on brownfield and City Centre land, particularly as COVID may impact on retail. Change of use to residential should be considered.

Amount of Housing / Development Identified is too Much

13: Objects to all new houses proposed the Local Development Plan. Respondent believes that Aberdeen City does not need any new houses.

21: The economic outlook for the city needs to be fully reassessed for the period of the Aberdeen Local Development Plan. Past data of an improving economic situation is now much less relevant; contraction of the local economy is anticipated in the short term with, potentially, a much longer-term recession dragging on into the term of this Plan. Even with the current economic forecast, the housing allowances (given on page 22) and the areas of land release (shown on the City Wide Proposals Map) seem to be too big. Based on the revised economic outlook, the need for the number and extent of new developments (housing, business and industrial) must be critically re-evaluated and reduced where appropriate.

959: In commenting on the Spatial Strategy, paragraph 3.8, Table 3, the respondent recognises that housing allowance is set by the Aberdeen City and Shire Strategic Development Plan 2020. Respondent however objects to scale and characteristics of the new housing allocations. The respondent notes the Council's calculation shows a shortfall of 1,258 homes. They are however concerned about the allocation of 797 extra homes on Table 3 beyond the Aberdeen City and Shire Strategic Development Plan 2020 requirement. The respondent includes calculations for small and large site allocations. They claim this number is likely higher in real terms because the number of homes in allocated sites may increase and non-allocated brownfield sites may be redeveloped. They note that Scottish Planning Policy requires the Plan to allocate for the first 10 years, and not 12 years, from which the 1,258 figure is derived. The respondent considers that excess allocation undermines City's existing strategic allocations. Instead, delivery on existing strategic sites should be prioritised. The respondent considers that the Council's strategy does not focus on brownfield sites as claimed in the Main Issues Report. They note that brownfield sites make up a larger share of new allocations, however the greenfield allocations are not small-scale. They consider that the new allocations propose an excessive level of housing which will impact on delivery and contradict Scottish Planning Policy.

1103, 1104, 1113, 1121, 1122, 1124, 1125, 1127, 1130: The respondent notes an unprecedented number of empty office spaces around the City, in line with the decline of the oil industry and this will be exacerbated by Covid-19 as more companies embrace working from home. These buildings are an eyesore, are not being maintained and will only deteriorate further. Consider that this is the time for Aberdeen City Council to think 'out of the box' and embark on an initiative to transform brownfield and neglected office spaces into residential homes. This could be done well and tastefully and would prevent the Green Belt from being further decimated.

1109: The respondent objects to the number of new houses proposed. There is already a large over supply, as evidenced by the large numbers of properties for sale in the City Centre. Part exchange has distorted the market as these properties now sit empty. If new housing is required, then Aberdeen City Council should focus on utilising existing empty properties rather than building new ones.

Concern over who will live in these properties. Note the decline in the oil industry and consider that many people currently in Aberdeen will relocate, and there is no new industry coming in to replace it.

1111: The proposed sites for housing development across Aberdeen City are incredibly concerning. Demand for housing in the Aberdeen City area has dwindled, and note that a number of new houses are not sold thus impacting on the local property market as supply outweighs demand.

1156: In commenting on housing numbers, the respondent is concerned that in the context of COVID the housing numbers in the Aberdeen City and Shire Strategic Development Plan 2020 are too high. They are also concerned that the build out rate is far below that expected, therefore meaning that many sites will take much longer to complete. These figures therefore need to be reconsidered.

Other Comments

897: Consider that Table 2, page 22, of the Proposed Local Development Plan needs to be consistent with the Aberdeen City and Shire Strategic Development Plan 2020. The respondent states that paragraph 3.5 of the Proposed Local Development Plan requires a minor change given the Aberdeen City and Shire Strategic Development Plan 2020 has now been approved by the Scottish Ministers.

Modifications sought by those submitting representations:

Housing Land

717: The respondent does not agree with the Council's assessment of Housing Land Supply and the effectiveness of the supply. They consider that further justification is required on the deliverability of sites (particularly brownfield and publicly owned sites). They consider that the housing allowances of the approved Aberdeen City and Shire Strategic Development Plan 2020 are not met in the Proposed Local Development Plan. Additional sites should be identified in the Proposed Local Development Plan to meet the housing allowances.

781: Modify Proposed Local Development Plan paragraph 3.7 as follows: *"This Local Development Plan needs to show how we will meet the 5,107 housing allowance which the Strategic Development Plan sets for Aberdeen for the period to 2032. Potentially, any sites identified as being constrained in the 2019 Housing Land Audit (HLA) cannot be counted towards the allowances for 2020-32. This Plan will include the following:*

- *Greenfield sites identified in the 2017 Local Development Plan but not in the 2019 HLA 42 units*
- *Brownfield Sites identified in the 2019 Brownfield Urban Potential Study 565 units*
- *Total 607 units"*

Modify Proposed Local Development Plan paragraph 3.8 as follows: *“We have not counted the 2,464 constrained greenfield sites from the 2019 HLA on the basis that most of them are part of larger sites and may not all be delivered during that period. This means we would have up to 607 units which can be counted towards the 5107 allowances, leaving a shortfall of 2,742 units which will be met though the new allocations set out below”*.

Modify Proposed Local Development Plan Table 3 - New Housing Allocations to include additional new allocations with a capacity of 2,742 homes.

Modify Appendix 1 - Brownfield Sites and the Brownfield Urban Capacity Study to remove 45-47 Holland Street, 133 Union Street, Pittodrie Stadium, 1 Western Road, Broadford Works, 1-5 Salisbury Terrace, 9 Pittodrie Place, 67 Jute Street, Bruce Motors, 32-36 Fraser Place, Balgownie Centre and Burnside Drive.

900: In relation to the housing land allocations of the Proposed Local Development Plan, the respondent considers that there is a shortfall in meeting the Aberdeen City and Shire Strategic Development Plan 2020 requirements, and that this should be addressed through the allocation of additional land that is considered to be effective within the Plan period.

959: Revise strategy to reflect the 1,258 figure for new allocations set by the Aberdeen City and Shire Strategic Development Plan 2020. Reconsider newly allocated greenfield sites.

Remove sites OP2, OP53 and OP46. This will reduce new allocations figure to 1,105 and comply with paragraph 119 in Scottish Planning Policy – identifying housing need for 10 years. If the full 1,258 units are needed, additional homes could be accommodated across one of those sites or a combination.

Brownfield Sites

545, 546, 547, 548: Review Brownfield Sites report.

717: The Brownfield Urban Capacity Study should be monitored annually in consultation with the house building industry.

Amount of Housing / Development Identified is Too Much.

13: Discard the Proposed Aberdeen Local Development Plan.

21: Due to the current economic situation the number of housing allocations needs to be reduced or re-evaluated.

1109: If new housing is required, then Aberdeen City Council should focus on utilising existing empty properties rather than building new ones.

1111: A large reduction in the proposed areas for housing development.

Summary of responses (including reasons) by planning authority:

Many of the representations on this issue are interconnected so our approach to responding to them will be to look at an overall theme before turning to more specific comments.

General Comments

The general approach to housing land is set out in Section 3 of the Proposed Local Development Plan – the Spatial Strategy. It should be noted that this section refers to the Proposed Aberdeen City and Shire Strategic Development Plan 2018 (CDXX) because, at the time of writing, the Aberdeen City and Shire Strategic Development Plan 2020 had not been approved (this happened in August 2020). However, any figure quoted reflects those recommended in the Strategic Development Plan Examination Report (CDXX), all of which were adopted in the approved Aberdeen City and Shire Strategic Development Plan 2020. The simplest way to overcome this anomaly would be to replace ‘Proposed Strategic Development Plan 2018’ with ‘Strategic Development Plan 2020’ throughout this section and we would regard this as a non-notifiable modification which will clarify the matter.

Prior to the release of the Aberdeen City and Shire Strategic Development Plan Examination Report (CDXX), the Main Issues Report (CDXX) and early working drafts of the Proposed Local Development Plan used the figures contained in the Proposed Aberdeen City and Shire Strategic Development Plan 2018 (CDXX) to calculate the housing allowances. This contained an allowance of 4,168 homes for Aberdeen City for the period 2020-32 (Table 3 of the Proposed Aberdeen City and Shire Strategic Development Plan 2018 on page 30). However, the Strategic Development Plan Examination Report (CDXX) recommended increasing this figure by 939 homes to 5,107 homes and the use of the Aberdeen City and Shire Housing Land Audit 2019 (CDXX) as the base year. This is the figure adopted in the approved Aberdeen City and Shire Strategic Development Plan 2020 (CDXX).

As a consequence of the increased Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) allowances, five further Opportunity Sites were identified in the Proposed Local Development Plan totalling 1,060 homes. These 5 sites are:

- OP2 Cloverhill (550 homes)
- OP12 Silverburn (100 homes)
- OP46 Royal Devenick Park (150 homes)
- OP53 Tillyoch (250 homes)
- OP54 Craigton Peterculter (10 homes)

Housing Land

717, 859, 891, 895, 897: These representations query the Council’s general approach to identifying the allowances required by the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX). Paragraphs 3.1 to 3.8 of the Proposed Local Development Plan explain in detail how the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) allowances for Aberdeen City for 2020-32 (5,107 homes) are met. It may be helpful to further summarise these below:

1. Brownfield Sites identified in the Brownfield Urban Capacity Study 2019 (CDXX) = 3,807 homes

2. Greenfield sites identified in the extant Local Development Plan 2017, but not in the Aberdeen City and Shire Housing Land Audit 2019 (CDXX), (OP109, OP111 and OP113) = 42 homes
3. New allocations with housing numbers attached (OP2, OP4, OP11, OP12, OP14, OP26, OP46, OP53, OP54, OP66, OP69, OP89) = 1,604 homes units

This totals 5,453 homes, which on its own meets the 5,107 homes required by the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). In addition, the Proposed Local Development Plan allocates five further new brownfield sites covering 10.53 hectares to which no housing numbers are attached (OP6, OP35, OP37, OP76, OP83). If the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) target of 50 dwellings per hectare is applied to these sites, this could amount to a further 526 homes.

A further source of residential development will be the City Centre Masterplan Sites. There are eight sites from the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) which have been identified as Opportunity Sites in the Proposed Local Development Plan. Four of these sites have substantial residential elements to them. The Proposed Local Development Plan does not attach precise housing numbers to these in order to allow flexibility in developing mixed use Masterplans for them. However, the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) ascribes residential numbers to the following sites totalling 1366 homes;

- OP70 Denburn Valley (260 homes)
- OP81 Queens Square (330 homes)
- OP96 Castlegate and Castlehill (46 homes)
- OP106 Torry Waterfront (730)

Aberdeen City Council is currently progressing proposals for the City Centre Masterplan and a number of elements have already been delivered including Marischal Square office development, refurbishment of the Music Hall, the refurbishment of the Aberdeen Art Gallery and the ongoing redevelopment of Union Terrace Gardens. This shows there is a consistent track record of delivery of the components of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) interventions. Planning application 181702/PPP has also been approved (CDXX) for 258 homes on part of the OP106 – Torry Waterfront site.

It should also be noted that new residential development can come forward on allocated sites as higher densities than stated in the extant Local Development Plan 2017 (CDXX, CDXX) and on unallocated sites within established areas where the conditions of the site may allow for such. Since the publication of the Proposed Local Development Plan permission has been granted for approximately 670 new homes on allocated or unallocated sites within residential areas. These permissions will ensure an additional land supply which will maintain a steady delivery of new homes.

Housing Land – Other Comments

885: There is no need to set out the housing numbers in the same format as that found in the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) forms part of the Development Plan and both documents should be read together. Tables 1, 2 and 3 in the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) set out the Housing Land Targets,

Housing Land Requirements and Local Development Plan allowances and there is no need or requirement to repeat these in the Proposed Local Development Plan. The purpose of the allowances is to ensure that Local Development Plans can maintain an effective five-year Housing Land Supply at all times. This requirement is also included in Scottish Planning Policy 2020 (CDXX) and there is no need to repeat it here.

Additionally, Housing Land Supply is considered at a Housing Market level. The Aberdeen Housing Market Area is a regional entity which includes all of Aberdeen City administrative area and part of Aberdeenshire Council administrative area. Housing Supply Targets, Housing Land Requirements, and market and affordable sectors are best illustrated at a regional level.

895: There is already a very wide geographic spread of housing sites within and around Aberdeen resulting from both the Local Development Plan 2012 (CDXX) and the extant Local Development Plan 2017 (CDXX). This includes significant allocations at Bridge of Don, Grandhome, Newhills, Greenferns, Maidencraig, Countesswells, Deeside, and Cove/Loirston as well as a substantial number of brownfield sites throughout the urban area.

900: The Proposed Local Development Plan's Spatial Strategy initially concentrates on new housing sites and demonstrates how these meet the allowances required by the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). However, there is a much more substantial number and volume of sites which have been carried over from the extant Local Development Plan 2017 (CDXX, CDXX). This includes strategic greenfield sites which could deliver approximately 20,000 homes. This figure does not include brownfield sites, new allocations, or the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) sites. In this context, the five additional housing sites identified by the Proposed Local Development Plan at Peterculter (OP51, OP52, OP53, OP54 and OP109), totalling 306 homes, do not represent a concentrated cluster. There are substantial allocations in and around Bridge of Don but the justification and rationale behind these has been discussed in Examination into the 2017 Local Development Plan (Issue 4) (CDXX and in Issue 3 - Allocated Sites Bridge of Don. Cults has historically experienced housing development at Friarsfield, which has steadily delivered new homes for a number of years, with only the area identified at OP41 remaining to be developed. Just to the north of Friarsfield lies OP38 - Countesswells, which is allocated for 3000 homes, development of which is currently underway. There is therefore no strategic need to identify further development at Friarsfield North, or anywhere else in Cults.

900: The Brownfield Urban Capacity Study (CDXX) identifies brownfield sites which could accommodate 3,807 homes. Of the new allocations identified in Table 3 of the Proposed Local Development Plan, 1,054 homes are on sites which are currently greenfield or green space (OP2, OP4, OP11, OP26, OP46, OP53, OP54 and OP89). The rest are brownfield totalling 550 homes plus those with no number allocated to them amounting to 10.53 hectares. There are also, as set out above, Aberdeen City Centre Masterplan and Delivery Programme (CDXX) sites which can delivery new homes. We therefore accept that the majority of the new allocations (including Brownfield Urban Capacity Sites) are brownfield. However, in the context of the OP sites carried over from the extant Local Development Plan 2017 (CDXX), brownfield site housing numbers continue to be well outnumbered by greenfield numbers.

Tables 2 and 3 of the Aberdeen City and Shire Housing Land Audit 2019 (CD XX) show that of the 19,911 homes identified in the established land supply for Aberdeen City, only 17% are on brownfield sites. It was agreed during the Examination of the Aberdeen City

and Shire Strategic Development Plan 2020 (CDXX – Issue XX) that the Aberdeen City and Aberdeenshire Housing Land Audit 2019 (CDXX) would be the base year for informing Housing Land Supply. The new allocations in the Proposed Local Development Plan are an attempt to create a more balanced greenfield / brownfield split in line with the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) target (on page 27) of 40% of all new housing in Aberdeen City to be on brownfield sites. When the allocations of the Proposed Local Development Plan are included in the Aberdeen City and Shire Housing Land Audit 2020 (CD XX), this increases the percentage of the established land supply to 23% brownfield. Therefore, the majority of the Housing Land Supply for Aberdeen City remains on greenfield sites and there is no justification in identifying any more. The established land supply increased to 21,331 homes in the Aberdeen City and Shire Housing Land Audit 2020 (CDXX).

Deliverability of Sites

717: The Housing Supply Target and the Housing Land Requirement are set by the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and the Proposed Local Development Plan has allocated a sufficient number of sites to meet these requirements.

The respondents make reference to the deliverability of sites in the context of brownfield allocations and public ownership. There are two issues to consider in addressing these concerns; firstly, what is the function of a development plan in relation to land supply and secondly what infrastructure is needed to support these new allocations.

Paragraph 119 of Scottish Planning Policy 2020 (CDXX) states at paragraph 119 that *“Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met”*. Allocations carried forward from the extant Local Development Plan 2017 (CDXX) and new allocations in the Proposed Local Development Plan more than amply cover the above requirements. There are also historic allocations which have permissions and are delivering a steady supply of new homes and this is evident from numerous Housing Land Audits (CDXX for 2014 through to 2020 audits) which show that the Aberdeen Housing Market Area has consistently, and securely, maintained an effective five year Housing Land Supply. The addition of new sites to the Proposed Local Development Plan ensures that there is a pipeline of allocations which ensures the continuity of supply. It can take a number of years for sites to become deliverable, and the Proposed Local Development Plan ensures that there are a wide range of sites, of varying scales and across a wide geographic area, which can meet long term need up to 2032.

Paragraph 4.18 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states *“New allocations should consider opportunities to reuse brownfield land and attempt to utilise the current “constrained” supply in the first instance”*. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) is a statutory document which the Proposed Local Development Plan must conform with. The use of brownfield sites, and sites which are currently constrained, is therefore appropriate given land supply is a strategic matter. With regard the delivery of the brownfield sites, these are located in

established areas which already have access to operational infrastructure such as schools, shops and transport connections. They align with emerging aims from the National Planning Framework's autumn statement (CD XX) which places greater emphasis on brownfield allocations and compact sustainable development in the form of twenty-minute neighbourhoods.

In response to assertions that public ownership of land is a barrier to a sites effectiveness, this is not considered a reasonable position. Where a site is in one ownership there are less legal issues and the site is likely to become effective once a delivery plan is put in place. The Council has a number of mechanisms to deliver these sites such as through the Local Housing Strategy (CDXX), in partnership with Registered Social Landlords or marketing such sites to interested parties. Those sites are currently classed as constrained in the Aberdeen City and Shire Housing Land Audit 2019 (CDXX) but, as stated above, the five-year effective land supply has been and is being comfortably maintained. The respondent is incorrect in their assertion that the sites must be delivered during the Plan period, as there is no requirement in Scottish Planning Policy (CDXX) for Development Plans to ensure this other than to rather to maintain an effective land supply.

Comments relating to Tillyoch (OP53) and Royal Devenick Park (OP46) are dealt with in Issue 11: Allocated Sites Deeside and Issue 13: Allocated Sites Loirston and Cove respectively

859: The respondent's interpretation of the Housing Land Supply and the role of a Local Development Plan is flawed, as is the assertion that there is justification for additional greenfield sites due to actual completions recorded in Audits and anticipated completions differing. Paragraph 45 of Planning Advice Note 2/2010 - Affordable Housing and Land Audits (CD XX) states with regard to Housing Land Audits that: "*They have two key functions: to demonstrate the availability of sufficient effective land to meet the requirement for a continuous five-year supply; and to provide a snapshot of the amount of land available for the construction of housing at any particular time*". The role of allocating land in a Local Development Plan is to ensure there is a steady supply of housing land over a strategic period of time, and it is evidenced through the Aberdeen City and Shire Housing Land Audits that this is the case (CDXX for 2014 through to 2020 audits). There will be periods of time where delivery is lower than anticipated completions and vice versa and this is mostly down to market factors. The North East has been affected by the downturn in the oil and gas sector over recent years and this has had an impact on demand. However, the Local Development Plan's focus is on supply, and this has been amply met by the Proposed Local Development Plan. There is enough headroom built into the Proposed Local Development Plan's Housing Land Supply to accommodate increases in demand.

The figures in the Aberdeen City and Shire Housing Land Audit are given to Officers by housebuilders and developers. Paragraph 6.2.1 of the Aberdeen City and Shire Housing Land Audit 2019 (CDXX) shows that the only disagreement on the effective land supply was a single site of 27 homes. These figures are therefore considered to be robust and show that there are enough housing sites identified. Identifying more greenfield sites is unlikely to deliver more houses. It will simply lead to the most marketable sites being cherry picked at the expense of others.

In addition, the respondent states that larger strategic sites have been under-delivering and therefore an additional Strategic Reserve of sites needs to be allocated. The identification of a number of large sites is necessary in part to ensure a continued long-

term effective supply of housing land. Large sites support a range of facilities and services within the new development, enable the delivery of significant infrastructure improvements, create mixed sustainable communities and avoid the problems that disjointed incremental growth can have. Through the Development Options Assessment process (CDXX) we have historically sought to identify sites which can make the most efficient use of existing infrastructure. It is acknowledged however that large sites can take longer to come to fruition. However, with the exception of the new allocation at OP2 - Cloverhill, all the major greenfield sites of 500+ homes from the extant Local Development Plan 2017 have approved Masterplans. The following are already delivering homes: OP20 - Craibstone, OP21 - Rowett South, OP31 and OP32 - Maidencraig, OP9 - Grandhome, OP38 - Countesswells and OP48 - Oldfold. The Aberdeen City and Shire Housing Land Audit 2019 (CDXX) predicts that homes at OP59 - Loirston will also be delivered within the next five years. Much of the work on dealing with the complexities of larger sites has therefore been completed.

859: Aberdeen has a generous housing supply resulting from a wide range of greenfield and brownfield sites being identified in the Proposed Local Development Plan and from previous Plans. These are likely to be augmented by further windfall and brownfield sites and sites identified through future Brownfield Urban Capacity Studies. There is a very healthy land supply, and this is likely to be maintained as the larger sites continue to progress. In this context there is no need for a draw down mechanism to augment the supply. In any case, such a mechanism is not a requirement of Scottish Planning Policy (CDXX).

862: As stated above, the Proposed Local Development Plan conforms with both Scottish Planning Policy 2020 (CDXX) and the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) in terms of providing a range and mix of housing which maintains the effective five-year land supply. Paragraph 4.17 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states that "*It is important that the scale of these allocations does not undermine the deliverability and viability of the effective housing land supply*". As such, the level of allocations in the Proposed Local Development Plan has been carefully considered so to augment the land supply and not to an extent to undermine its deliverability (as has been outlined above with reference to the delivery of easier or more marketable sites). The respondent's concerns regarding the delivery of brownfield sites and the effectiveness of allocated sites has been responded to above. With regard to the density target, this is set by the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and was considered through that Plan's Examination, specifically Issue 11 - Our Communities (CDXX). The Reporter subsequently recommended no modifications to the Target on page 27 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) which states "*In the Aberdeen City Strategic Growth Area this target should increase to generally no less than 50 dwellings per hectare*". The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) is a statutory document and forms the strategic part of the Development Plan. The Proposed Local Development Plan must therefore conform with the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX).

Bid Sites B0315 and B0314 are dealt with in Issue 8 - Alternative Sites Kingswells and Greenferns. Bid sites B0938 B0939 and B0943 are dealt with in Issue 12 - Alternative Sites Deeside.

895: The respondent's submission would indicate an incorrect interpretation of the measuring of the five-year Housing Land Supply. Prior to the publication of Up until the

recently amended Scottish Planning Policy 2020 (CDXX) and the introduction of Planning Advice Note 1/2020: Assessing the Extent of the Five-year Supply of Effective Housing Land (CD XX), the five-year effective land supply was calculated against the Housing Supply Target, as set in the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The respondent conflates delivery with land supply and discusses that over a five-year period there has been under delivery of homes when compared to anticipated completions and that, if this is extrapolated forward without any consideration of economic or demographic factors, there will be a shortage of Housing Land Supply. For the same period, the five-year effective land supply has remained above seven years in the Aberdeen Housing Market Area. It is therefore evident that the issue relates more to demand than to supply and this reflects the downturn in the City Region's economy.

Housing allocations and numbers have already been approved by the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). This shows that an increase to the Housing Supply Target of 20% generosity has already been applied for the period to 2032 and this is carried through to the allowances. There is no scope for a Local Development Plan to increase the allowances set by the Strategic Development Plan and no need for it to do so.

Table 2 of the Aberdeen City and Shire Housing Land Audit 2019 (CDXX) shows that there is an established Housing Land Supply of 19,911 homes in Aberdeen City. Table 7 of the Aberdeen City and Shire Housing Land Audit 2019 (CDXX) shows that the five-year effective supply in Aberdeen City is 6,242 homes, and Table 8 shows a post-five-year effective supply of 10,076 homes. Table 10 of the Aberdeen City and Shire Housing Land Audit 2019 (CDXX) shows that the five-year effective supply for the Aberdeen Housing Market Area is 10,816 homes, which equates to 7.2 years supply. This is a healthy and generous supply.

The figures in the Housing Land Audit are given to us by housebuilders and developers. Paragraph 6.2.1 of the Aberdeen City and Shire Housing Land Audit 2019 (CDXX) shows that the only disagreement on the effective land supply was a single site of 27 homes. These figures are therefore considered to be robust and show that there are enough housing sites identified. Identifying more sites is unlikely to deliver more houses. It will simply lead to the most marketable sites being cherry picked at the expense of others.

The respondent suggests that the housing strategy should take greater cognisance of delivery rates of larger strategic sites and allocate alternative sites where housing delivery is predicted to be slower than anticipated.

The identification of a number of large sites is necessary in part to ensure a continued long-term effective supply of housing land. Large sites support a range of facilities and services within the new development, enable the delivery of significant infrastructure improvements, and avoid the problems that disjointed incremental growth has. We have historically sought to identify sites which can make the most efficient use of existing infrastructure. It is acknowledged that large sites take longer to come to fruition. However, with the exception of the new allocation at OP2 Cloverhill, all the major greenfield sites of 500+ homes have approved Development Frameworks and / or Masterplans. The following are already delivering homes: OP20 Craibstone, OP21 Rowett South, OP31 and OP32 Maidencraig, OP9 Grandhome, OP38 Countesswells and OP48 Oldfold. The Aberdeen City and Shire Housing Land Audit 2019 shows that units at OP59 Loirston will be delivered within the next 5 years. Much of the work on dealing with the complexities of larger sites has therefore been completed.

The Proposed Local Development Plan conforms with paragraph 4.19 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) which states “*should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise*”. A range of what are, in comparison to strategic allocations, ‘smaller sites have been included for allocation in the Proposed Local Development Plan and this is in line with the respondent’s argument to not rely on only strategic allocations.

900: The respondent’s concerns mirror those of other representations which have been addressed above. The Proposed Local Development Plan’s new allocations for the period 2020-2032 contain a higher proportion of brownfield sites than greenfield. However, the respondent has failed to include in their representation the fact that the vast majority of the City’s Housing Land Supply is allocated on greenfield sites.

For the reasons outlines above, there is no need to identify Strategic Reserve over and above what is already identified. Paragraph 3.13 of the Proposed Local Development Plan explains: “*We will continue to identify the 3,440 homes at Greenferns, Greenferns Landward, Grandhome and Newhills which the 2017 Local Development Plan identifies for its Phase 2. These sites can be set against the new Period 2 Allowances for 2033-35. We do not propose to identify any further sites to meet the allowances for Periods 2 and 3. Neither Scottish Planning Policy or the Strategic Development Plan requires this Plan to do so. There is already a very healthy and long-term housing land supply in Aberdeen and we do not think that having more longer term allowances is necessary. Further brownfield, city centre masterplan and other windfall sites will also emerge over the next few years which will augment the already generous supply of housing land which we have.*”

Brownfield Urban Capacity Study

545, 546, 547, 548: The respondents’ comments are noted. The scope of the study is based around the Scottish Planning Policy 2020 (CD XX) definition of brownfield land which is (paragraph xx) that: “*Land which has previously been developed. The term may cover vacant or derelict land, land occupied by redundant or unused building and developed land within the settlement boundary where further intensification of use is considered acceptable*”. Sites which are designated as industrial and recently vacant in the first instance would be sought to be redeveloped for similar purposes. Vacant housing could be temporarily vacant due to legal issues and therefore could be brought back into use relatively quickly. The Brownfield Urban Capacity Study’s criteria for a site’s inclusion is set out in paragraph 2.2 of the document on page five (CDXX).

717: The Aberdeen City and Shire Housing Land Audit is undertaken annually. Within the Aberdeen City and Shire Housing Land Audit are the allocated sites of the extant and Proposed Local Development Plan. The Aberdeen City and Shire Housing Land Audit records the status of all sites such as effective or constrained, greenfield or brownfield. As such, a comprehensive monitoring mechanism is already in place.

The respondent’s concerns relating to delivery have been addressed above with regard the continuity of the five-year effective land supply. However, by way of example, OP93 Summerhill is a brownfield site owned by Aberdeen City Council. The site has an area of 3.26 hectares and is allocated for development. Construction is underway for 369 affordable homes, which is a density of over 110 homes per hectare. OP105 Kincorth Academy is also a brownfield site with an allocation of 230 homes and has a site area of 3.95 hectares (with a planning application for 213 homes pending). This results in a density of 58 homes per hectare. Both developments are on course to be completed by

2023. There are a number of other sites which sit within the gift of the Council and are scheduled to commence development. These sites are predominantly brownfield and demonstrate the sites are deliverable at relatively high levels of density.

781, 895, 859: The respondents make comments regarding Proposed Local Development Plan paragraph 3.7, 3.8 and Appendix 1 - Brownfield Sites. The respondents provide calculations and argue that the Council are required to allocate a further 2,742 homes prior to submission for Examination. The respondent's assertion that the Council is required to allocate additional homes is flawed. It is set out in detail above how the allocations of the Proposed Local Development Plan have been reached and their component mix of greenfield and brownfield. The respondents put forward a different interpretation of the capacity of brownfield sites, which they are entitled to do, however as shown by the examples of OP93 and OP105 above, brownfield sites can be delivered and at a higher density that put forward in the Brownfield Urban Capacity Study (CD XX). OP106 - Torry Waterfront has an area of 5.02 hectares. This allocation will support the delivery of the City Centre Masterplan's Vision and Aims (CDXX). Planning application 181702/PPP (CD XX) granted permission for 258 homes on approximately half the area of the overall allocation. The section of the site north of South Esplanade West is the subject site for the 258 homes and also comprises a mixed-use function and open space. The area to be developed under this permission is approximately 2.5 hectares and would result in a density of over 100 homes per hectare. This is further evidence that the brownfield sites allocated in the Proposed Local Development Plan are desirable for delivery by both the market and affordable sectors at a density higher than that required by the Aberdeen City and Shire Strategic Development Plan 2020.

885: The Brownfield Urban Capacity Study (CDXX) is not the only supporting document for the Proposed Local Development Plan. There is also the Proposed Local Development Plan Delivery Programme (CD XX) which is updated every two years. In terms of the delivery of sites which are owned by Aberdeen City Council, both the Local Housing Strategy (CDXX) and the Strategic Housing Investment Plan (CDXX) set out which sites are to come forward to aid the Council's delivery of affordable homes and when. The Proposed Local Development Plan supports the delivery of the brownfield sites through their inclusion in the Spatial Strategy which establishes the principle that such development is acceptable subject to consideration through the Development Management process.

895, 897, 900: The respondents have concerns that it is not appropriate to identify sites in the Proposed Local Development Plan which have been previously identified for housing in Housing Land Audits or previous Local Development Plans. As has been discussed, the Development Plan's primary role regarding housing land is to ensure a continuous pipeline of sites. The rate of delivery of many of these allocated sites will be affected by market demand. This is quite clearly set out in Aberdeen City and Shire Housing Land Audits through either the rate of anticipated completions or sites being classed as constrained due to marketability. Should demand increase, anticipated completions and actual completions will also increase, and the number of sites constrained by marketability will reduce.

The respondents reiterate similar concerns relating to both the delivery of brownfield land and the over allocation and reliance on brownfield land. The proportion of allocations in the Proposed Local Development Plan which are brownfield is still far less than greenfield and this has been responded to above. Matters relating to the deliverability of brownfield sites has also been addressed. Considering the level of brownfield delivery from 2010

onwards, the annual Aberdeen City and Shire Housing Land Audits have recorded the following annual completions on brownfield sites: in 2010 298 homes (CDXX), in 2011 484 homes (CDXX), in 2012 678 homes (CDXX), in 2013 586 homes (CDXX), in 2014 392 homes (CDXX), in 2015 270 homes (CDXX), in 2016 361 homes (CDXX), in 2017 225 homes (CDXX) and in 2018 288 homes (CDXX). This shows a steady stream of delivery of new homes on brownfield sites and which would again evidence that such sites are both desirable and deliverable. It should also be noted that brownfield sites had higher rates of delivery than greenfield sites during the first half of the last decade as greenfield sites were obtaining planning permissions and overcoming infrastructure issues. Brownfield should therefore be viewed as complementary to greenfield in terms of supporting a robust land supply.

The respondents have queried the use of the phrase 'up to' before the figure of 3,807 in the Brownfield Urban Capacity Study. It is not considered that such language demonstrates a lack of confidence in the deliverability of these sites. Such a figure is well evidenced given the track record of delivery on brownfield sites and should be viewed as a target rather than a restriction.

With regard sites in the Brownfield Urban Capacity Study (CDXX) being classed as constrained in the Aberdeen City and Shire Housing Land Audit 2019, it is expected that these will become effective over the 10-year period from the Proposed Local Development Plan's adoption. It is not considered that this is double counting and is in line with the Aberdeen City and Shire Strategic Development Plan 2020's requirement to use brownfield and constrained sites in the first instance.

1156: Support noted and welcomed. There are locations within the City Centre zoned Mixed Use which would enable residential development to be considered.

Amount of Housing / Development Identified is Too Much

13, 21, 1111: The Proposed Local Development Plan must align with the Aberdeen City and Shire Strategic Development Plan 2020 which is a statutory document and the strategic part of the Development Plan. During the course of the Examination into the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) the Housing Supply Target, the Housing Land Requirement and the Local Development Plan housing allowances were all considered. These had been informed by a robust and credible Housing Need and Demand Assessment 2017 (CD XX). A Development Plan is informed by the best available and most relevant data at the time it is produced. In most cases it is dependent on demographic and economic data such as population projections which are subject to change over time. While there had been a trend of negative migration for Aberdeen City for the years 2016-2018, that trend has stopped and there has been a positive inward migration of over 800 people for 2019 as indicated in the National Records for Scotland Net Inward Migration 2019 (CDXX). The respondent notes concern with the number of homes for sale and the period of time it takes for these homes to sell. While there may be homes for sale on the open market they may be at a price point beyond what is attainable for some people and therefore there would still be a need for housing at a more attainable point.

Regardless, there is a statutory period of review for a Local Development Plan which must be adhered to, and therefore it is not possible to revise a Plan multiple times through its production or the extant Local Development Plan would risk going beyond that review period.

959: The Council disagrees with the respondent's interpretation of the allocations in the Proposed Local Development Plan and considers that they will ensure an effective (but not excessive) land supply for the duration of the Plan period. Whilst we would not expect all proposals to precisely align with the number expressed in the Opportunity Sites, the numbers are considered reasonable, taking into account the constraints and opportunities on each site.

The scale of new greenfield allocations in the Proposed Local Development Plan is small when compared to the existing large strategic allocations which are part of the Masterplan areas. Their scale and location conform to the requirements of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX).

1103, 1104, 1113, 1121, 1122, 1124, 1125, 1127, 1130: The respondent's concerns are noted. There are a number of brownfield Opportunity Sites spread across the wider City and also in the City Centre which promote residential or mixed-use development in these areas. Delivery of such sites would align with the respondents' aspirations for the reuse of existing buildings or sites in established communities.

1109: Matters relating to the method of selling and purchasing homes, such as part exchange, are outwith the scope of the Examination of a Proposed Local Development Plan. As stated above, the Proposed Local Development Plan has allocated brownfield sites and also promotes regeneration in the City Centre. With regard the downturn in the oil and gas sector, the Regional Economic Strategy (CD XX) and the City Region Deal (CDXX) aim to diversify the City Region's economy to mitigate the impact of this downturn and return to sustainable economic growth.

1156: As stated above, the Proposed Local Development Plan is informed by the best available data during its production. The coronavirus pandemic occurred just after the Proposed Local Development Plan's approval at the Full Council Meeting of 2 March 2020. It could therefore not be factored into the Plan. There are many unknowns and data on the impacts of the pandemic is still emerging.

Other Comments

897: The respondent states that paragraph 3.5 of the Proposed Local Development Plan requires a minor change given the Aberdeen City and Shire Strategic Development Plan 2020 has now been approved by the Scottish Ministers. As mentioned earlier, the simplest way to overcome this anomaly would be to replace 'Proposed Strategic Development Plan 2018' with 'Strategic Development Plan 2020' throughout this section and we would regard this as a non-notifiable modification which will clarify the matter.

Reporter's conclusions:

Reporter's recommendations:

Issue 3	ALLOCATED SITES AND GENERAL AREA STRATEGY: BRIDGE OF DON / GRANDHOME	
Development plan reference:	Pages 23, 30 - 31, Appendix 2, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Colin Reekie (35) Darren Scott (37) Duolun Wu (43) Mark Ryan (49), Liam Barclay (51) Emma Thow (53) Michaela Charlton (54) Zara Li (75) Ms Elizabeth Moffat (89) Darren Martin (96) Cognito Oak LLP (127) Karen Hislop (128) Graham Taylor (130) Elizabeth Burns (134) Morag Thomas (135) Bridge of Don Community Council (137) Helen Sherritt (143) John Cowie (172) Pamela Shand (233) Stephanie Scott (247) Parklands View LLP (248) J and A F Davidson (471) Seweryn Wrozyna (506) The University of Aberdeen (555) Alison and Bryan Beaton (682) MJSM Developments Limited (725) Royal Aberdeen Golf Club (772) Anna and Wojciech Wesolowski (848) Callum Massie (850) NESTRANS (880) James Irvine (917) Mandy McPherson (919) Judith Byers (940) The Grandhome Trust (959) David Windmill (961) Andrew Todd (1136) Claire Spicer (1141) Melissa Mowatt (1147) Gwendoline Denny (1149) Bridge of Don Community Council (1150) Shirley A Copland (1158) Mr A Sangster (1188)</p>		

Provision of the development plan to which the issue relates:	Opportunity Sites in Bridge of Don / Grandhome
Planning authority's summary of the representation(s):	
<p><u>OP1 - Murcar</u></p> <p>772: Supports this allocation for business uses and requests that it remains as this zoning.</p> <p><u>OP2 - Cloverhill</u></p> <p>127, 961: The respondents support the allocation of OP2 Cloverhill as residential land. The site was previously zoned for employment land but as circumstances have changed it is more suitable for residential development.</p> <p>137, 772: The respondents have concerns relating to the change of zoning from employment to residential land. The respondent does not support the rezoning of OP2 Cloverhill from employment land to residential land. It is set out that during the Main Issues Report consultation such a rezoning was not considered. Bridge of Don already has considerable housing allocations and is under pressure in terms of infrastructure and services (roads, medical and educational). The respondent asserts that the rezoning is contrary to section 5.9 and 9.10 and policy WB2 Air Quality of the Proposed Local Development Plan.</p> <p>Concerned about the reduction of employment land in this area and associated increase in residential land. Queries the reasons for this change in strategy for this location and believes the change is not justified.</p> <p>772: Objects to the allocation of OP2 Cloverhill for residential development and states that an allocation of this size in this part of the city where there is already such an extensive supply of housing land is unlikely to assist in meeting the housing supply targets.</p> <p>1150: The respondents set out in their submission how recently completed additions and improvements to the Aberdeen Western Peripheral Route and road networks have improved the traffic levels in the Bridge of Don area. However, the respondent is concerned that this will be undone with the allocation of OP2 Cloverhill resulting in an additional number of new homes in the area placing pressure on the road network and other infrastructure (schools, medical centres etc). Such development will not only cause traffic congestion but also traffic safety issues for residents and school children. The respondent considers that this allocation on top of OP9 Grandhome will exacerbate the situation. The respondent disputes Aberdeen City Council's traffic modelling which they consider underestimates the impact of new development.</p> <p>1150: The respondent queries why land at OP2 Cloverhill has been rezoned to residential when such effort was placed in developing the Energetica project. Reference is made to the Planning Application for 550 homes at OP2 Cloverhill and questions the decision and that there are numerous amenity, infrastructure issues and that the site is not suitable for residential development.</p>	

OP3 - Findlay Farm, Murcar

772: Supports this allocation for business uses and requests that it remains as this zoning.

OP4 - North Denmore

75, 128, 134, 143: Do not support the development of OP4 North Denmore as it will result in a loss of green space, it will increase traffic, and there are concerns regarding access and parking.

OP6 - WTR Site at Dubford

725: Support allocation of brownfield site as OP6 for residential development. Proposed Local Development Plan does not give indicative number of units - previous submissions to the Council suggest around 20 would be appropriate.

OP7 - Aberdeen College Gordon Centre

233: Retain the trees on site as they offer protection to existing properties from the sea air, and offer a wide range of benefits, including habitat for wildlife and protected species. Tree retention is supported by the Councils Nature Conservation Strategy, Trees and Woodland Strategy and Local Plan policy on Trees and Woodlands, and the Planning Act. Retain and make better use of the existing woodland.

OP8 - East Woodcroft North

506, 682, 919, 1141, 1147: Concerns raised regarding access road and increased traffic, resident safety and access for emergency vehicles. The site is used for recreation, and play. Wildlife are present on site. There is sufficient housing in Bridge of Don already. Local schools are at capacity.

OP9 - Grandhome

54, 89, 130, 135, 940, 1149, 1158, 1188: Do not support development at OP9 Grandhome as it will result in the loss of green space used by the community, loss of habitat for wild animals, loss of residential amenity and increase traffic and air pollution. Scale of proposal is too large and inappropriate for the area. Local infrastructure will be put under greater pressure.

49, 53, 54, 917, 1136, 1149: Do not want a Gypsy/Traveller at OP9 Grandhome. Concerns regarding anti-social behaviour as a result.

130: The respondent feels there should be a separate consultation for the proposed Gypsy Traveller Site.

880: The respondent requests that the new pedestrian bridge at Grandhome should be paid for by the developer.

959: Supports continued allocation of site and Development Framework. Requests the Proposed Local Development Plan clarifies the process for updating and amending contents within the Development Framework. Concerned the Development Framework will

be almost 10 years old when the Proposed Local Development Plan is adopted, and Phase 1 of the development will almost be complete. Clarity is required to confirm changes can be made to the Framework. The Proposed Local Development Plan only states that the Framework is a material consideration.

1150: The respondent sets out in their submission how recently completed additions and improvements to the Aberdeen Western Peripheral Route and road networks have improved the traffic levels in the Bridge of Don area. However the respondent is concerned that this will be undone with the allocation of OP2 and OP12 resulting in an additional number of new homes in the area placing pressure on the road network and other infrastructure (schools, medical centres etc). Such development will not only cause traffic congestion but also traffic safety issues for residents and school children. The respondent considers that this allocation on top of OP9 Grandhome will exacerbate the situation. The respondent disputes Aberdeen City Council's traffic modelling which they consider underestimates the impact of new development.

OP10 - Dubford

37, 51, 96, 247: Objects to OP10 Dubford. The respondents believe that the proposed development will result in the loss of green space which is enjoyed by the community. Concerned that further development will increase traffic on already congested roads and put additional strain on existing infrastructure such as medical facilities and schools. Risk of flooding to surrounding properties and the development will negatively impact on seaward views and wildlife.

OP11 - Balgownie Area 4

555: Supports site allocation for 15 houses. Site is well located. University has a major influence in the city and has made a significant contribution to the local economy. Notes site scored well in the assessment. Notes Council's reference to a Tree Preservation Order and trees on western edge of the site. The Tree Preservation Order and retention of trees will be considered in the layout prepared as part of application process.

43: There is an endless stream of new development which is causing noise and dust and impacting on the amenity of the area. OP11 will further contribute to this.

848, 850: Objects to allocation of site. Impact on amenity of property due to overlooking, loss of daylight and overshadowing. Impact on wildlife within the site. Loss of flora - plants and trees within the site and next to the road leading to the parking on playing fields and next to the Davison House in the Technology Park. Loss of trees would fail to comply with Policy NE3 - Urban Green Space. Existing issues with parking related to the playing fields and a new development would result in an increase in traffic, leading to road safety issues. Objection due to significant disruption, destruction of wildlife, potential loss of privacy with possible overshadowing and loss of daylight, loss of trees and problems with road safety and volume of traffic at times.

OP12 - Silverburn House

248: Support allocation of the site for residential development of approx. 100 units. The site conforms to the Report into the Examination of the Proposed Aberdeen City and Shire Strategic Development Plan, and to Scottish Planning Policy. It is noted there is an

oversupply of employment land within Aberdeen city. The site is brownfield development and is able to deliver units within the Local Development Plan timescales, as such as planning permission in principle application has been submitted.

772: Objects to the allocation of OP12 Silverburn for residential development and states that good commercial and industrial buildings should not be demolished for residential development.

1150: The respondents set out in their submission how recently completed additions and improvements to the Aberdeen Western Peripheral Route and road networks have improved the traffic levels in the Bridge of Don area. However the respondent is concerned that this will be undone with the allocation of OP2 and OP12 resulting in an additional number of new homes in the area placing pressure on the road network and other infrastructure (schools, medical centres etc). Such development will not only cause traffic congestion but also traffic safety issues for residents and school children. The respondent considers that this allocation on top of OP9 Grandhome will exacerbate the situation. The respondent disputes Aberdeen City Council's traffic modelling which they consider underestimates the impact of new development.

OP13 - AECC Bridge of Don

35: Concerned that the proposed recycling centre is too close to residential development and could be positioned at a different location within the site.

172: Strong objection to the siting of the waste recycling centre near King Robert Way development and children's play area. The existing park and choose site should be monitored and secured at night to prevent joy riders.

772: Supports the statement in the Proposed Local Development Plan which states that the development "should respect the landscape setting and amenity of the course of the Royal Aberdeen Golf Club". Respondent objects to the proposed household waste recycling centre as a part of OP13 as this is not considered to be respectful of the amenity of the golf course. If this development were to go ahead, respondent requests that development is not located on the boundary of the golf course and that the required 20 metre buffer zone is extended to allow for modern golf equipment. Respondent also requests that noise arising from a waste recycling centre is not audible from the golf course.

OP45 - Berryhill

471: Respondent is concerned by the Council's decision to remove Berryhill (OP45) from the housing allocation for the Proposed Local Development Plan and leave Cloverhill as a stand alone housing site. Respondent owns land at Berryhill and raises concerns about safely running their farm at Berryhill if it is not included in the housing allocation. The dual carriageway would cut off OP2 Cloverhill meaning that people would have to walk through the respondent's land in order to access the shops at Murcar. This could render the fields unusable for growing crops or safely grazing cattle. Respondent believes that Berryhill has advantages over OP2 Cloverhill on it's own. Berryhill already has good access roads, and access is available off the Murcar roundabout. There are existing foot and cycle paths and it is close to shops and services at Murcar. Allocating the whole site would allow for masterplanning, affordable housing, shops, schools and leisure facilities

which is what is needed in Bridge of Don. Respondent also wishes to see a cycle path established along the side of the A92 from the Berryhill site linking through to Blackdog.

772: Supports this allocation for employment uses and requests that it remains as this zoning.

Aspirational Core Path AP1

772: Raises concerns regarding the Aspirational Core Path from Denmore Road to the Coast (AP1) which crosses the Royal Aberdeen Golf Club course behind the 10th green. Respondent states that the location is unseen on approach to the 10th green leading to an increased risk of accidents. Respondent raises concerns regarding coastal erosion of the dune system which would have long term implications for the golf course. Respondent believes that an increase in footfall in this area (from Aspirational Core Path AP1) could hasten coastal erosion. Respondent states that the location is unseen on approach to the 10th green leading to an increased risk of accidents. Respondent raises concerns regarding coastal erosion of the dune system which would have long term implications for the golf course. Respondent believes that an increase in footfall in this area (from Aspirational Core Path AP1) could hasten coastal erosion.

Modifications sought by those submitting representations:

OP2 - Cloverhill

137: Develop on waste land and regenerate existing areas of the city rather than development on greenfield sites.

772: Rezone OP2 - Cloverhill as Business and Industrial Land.

OP4 - North Denmore

75, 134: Do not develop OP4 North Denmore.

143: Ensure access to properties is from Dubford Road and not Seaview Drive due to parking capacity issue.

OP8 - East Woodcroft North

919, 1141, 1147: Remove OP8 from the Proposed Local Development Plan.

OP9 - Grandhome

49, 53, 1136, 1149: No Gypsy/Traveller site at OP9 Grandhome.

54: Improvements need to be made in the local transport infrastructure

130: Carry out a separate consultation on the proposal to include a site for travellers in the Development Plan. Halt the release of any further sites for construction until a full review and possible further consultation has been carried out on the impact of infrastructure and services in the Bridge of Don.

135: Develop on waste land and regenerate existing areas of the city rather than development on greenfield sites.

880: Explicit reference in the Proposed Local Development Plan that the future pedestrian bridge at Grandhome should be paid for by the developer.

940: Restrict development to the area where consent has already been granted.

959: Either within the Grandhome section or as part of Appendix 3, the Proposed Local Development Plan should specify that: (i) further revisions or Masterplans to the adopted Development Frameworks will be supported; (ii) those revisions can be made for localised or comprehensive adaptations where these reflect updated requirements on site and changing market demands; and (iii) changes of this nature can be brought forward at any time for partial or full adoptions.

1149: Development should have fewer houses and buildings being constructed and for more countryside to be retained.

1158: Last Phase of Grandholm development i.e. relating to the area north of Whitestripes Road be removed and left as open space.

OP10 - Dubford

51, 96: OP10 should not be developed or, if it is, to be limited to 100 homes.

OP11 - Balgownie Area 4

43: Delay further housing delivery to reduce impact on amenity.

OP12 - Silverburn House

772: Remove OP12 Silverburn as an Opportunity Site.

Aspirational Core Path AP1

772: Respondent seeks the removal of Core Path AP1 from the Proposed Local Development Plan's Constraints Map due to safety concerns.

Summary of responses (including reasons) by planning authority:

Bridge of Don Area

In the Bridge of Don area many of the Opportunity Sites (OP Sites) have been carried over from the extant Local Development Plan 2017 (CDXX) which were allocated at that time following favourable consideration at the last Examination through Issue 3 (CDXX). The principle of development in this area is therefore long established and it remains appropriate to retain these development opportunities as there has been no significant change in circumstances to justify an amendment to the designations.

The larger sites that have been carried over are subject to approved Development Frameworks and Masterplans, including the Bridge of Don AECC Development Framework (CDXX), the Dubford Development Framework (CDXX) and the Grandhome

Development Framework (CDXX). Dubford and Grandhome developments are both underway with many units being occupied. The intention is for these documents to be taken forward as Aberdeen Planning Guidance where they will be material in determining planning proposals.

OP1 - Murcar

772: Support for allocation of OP1 Murcar is noted and welcomed.

OP2 - Cloverhill

General

Running parallel to the production of the Proposed Local Development Plan was the examination of the Proposed Strategic Development Plan 2018. The Proposed Strategic Development Plan was submitted to the Planning and Environmental Appeals Division of the Scottish Government in April 2019. The report of examination (CD XX) was not received by the Aberdeen City and Shire Strategic Development Planning Authority until January 2020. The report of examination included suggested modifications to table 3 of the Proposed Strategic Development Plan 2018 (CD XX) which increased the Housing Allowances in the approved Strategic Development Plan 2020 (CD XX) and that of any subsequent Aberdeen and Aberdeenshire Local Development Plans by an additional 939 new homes for the period 2020-2032.

The approval of a Strategic Development Plan is the responsibility of the Scottish Government and there is not a statutory period of time set in which it must be approved. There is, however, a statutory period of review for a Local Development Plan and consequences should this not be met. Paragraph 24 of Circular 6/2013 Development Planning (CD XX) states "*planning authorities are expected to move quickly from the MIR through to the Proposed Plan and towards submission to Scottish Ministers and adoption*". Having completed the Main Issues Report consultation, being mindful of the Circular and the statutory review period additional sites, which had come through the Call For Sites and Main Issues Report Consultation, were selected for inclusion in the Proposed Local Development Plan. This ensured that the Housing Allowances as set in the Strategic Development Plan 2020, which is a statutory document that the Local Development Plan must conform with, are met.

The sites put forward to meet the additional 939 homes have been spread across the City thus providing a range of sites of varying size and complying with paragraph 119 of Scottish Planning Policy.

The site extends to 22.5 hectares and forms part of an extensive Business and Industrial land allocation in the extant Local Development Plan 2017, further identified as an opportunity site (OP2 Berryhill, Murcar), with a flood risk being noted in the allocation text. A Green Space Network (GSN) designation covers a large swathe of land running from east to west through the central part of the site. Planning permission in principle was granted on 30th April 2020 (CDXX) by Aberdeen City Council Planning and Development Management Committee for the erection of residential led, mixed use development of approximately 550 homes, community and sports facilities, retail (Classes 1, 2, 3 and Sui Generis) with associated landscaping, open space and infrastructure.

127, 961: Support for the allocation is noted.

137, 772: The Aberdeen City and Shire Employment Land Audit is undertaken regularly, with the aim of providing up-to-date and accurate information on the supply and availability of employment land in the Region. The Strategic Development Plan 2020 (CD XX) sets a requirement for at least 60 hectares of marketable land available to businesses in a range of places in Aberdeen City. The Employment Land Audit 2018/19 (CDXX) identified an 'established' employment land supply of 274 hectares, of which 210 hectares was identified as 'marketable'. The Cloverhill site extends to 22.55 hectares and forms part of that marketable supply. This indicates that residential development at Cloverhill would not result in any shortage of available employment land, with a significant surplus being maintained over and above the target set in the Aberdeen City and Shire Strategic Development Plan 2020.

With regard to concerns raised regarding air quality, the Proposed Local Development Plan considers the principle of a type of development and parallel to this a detailed Environmental Report (CD XX) considers environmental issues for an allocation. Should a development proposal come forward on OP2 Cloverhill then consideration of such a proposal would be undertaken against the suite of policies contained within the extant Local Development Plan 2017 and Policy WB2 Air Quality would be one of these. The allocation is not located within an Air Quality Management Area.

772: As set out above, the Modifications as a result of the Examination into the Aberdeen City and Shire Strategic Development Plan 2020 meant an increase in housing land allowances for Aberdeen City, and the re-zoning of the Cloverhill site in the Proposed Local Development Plan contributes to meeting this statutory requirement. Scottish Planning Policy (CDXX) requires Local Development Plans to provide a range and mix of sites in order for the Housing Supply Target and the Housing Land Requirement to be met. The allocation of OP2 Cloverhill offers an additional housing land provision for Aberdeen City and the Aberdeen Housing Market Area which will ensure that the five-year effective land supply is maintained while also ensuring there is a steady pipeline of allocated sites for the delivery of new homes. While there are substantial allocations in the Bridge of Don area they are strategic allocations which have been included in recent Local Development Plans to meet long term housing need and offer the scale to deliver the essential infrastructure communities need. OP2 Cloverhill is complementary to these allocations.

1150: The respondent's concerns regarding the change in zoning cancelling the benefits of the Aberdeen Western Peripheral Route are noted. The zoning for OP2 Cloverhill in the extant Local Development Plan 2017 is for employment land. While currently undeveloped, the allocation was considered as part of the Cumulative Transport Assessment 2018 (CDXX) which considered all current network use and the delivery of all allocated sites. Impact on the Aberdeen Western Peripheral Route was considered as part of the Assessment and a suite of transport interventions to mitigate the impact of vehicular movement has been included in the Proposed Local Development Plan in the Summary of Transport Interventions Table (page XX). The change from employment to residential is considered to result in a switch from destination to origin and that the interventions as set out in the Proposed Local Development Plan should mitigate such impacts. There is also an ongoing commitment to monitor both the local and strategic transport networks as part of the Regional Transport Strategy (CDXX) and the Delivery Programme (CDXX).

While a separate process, a transport assessment accompanied Planning Permission in Principle 191171 (CD XX). This was considered by the Council's Roads Development Management Team and considered acceptable.

1150: With regard to the respondent's query as to OP2 Cloverhill zoning change, this has been addressed above. Planning permission in principle 191171 was granted on 30th April 2020 by Aberdeen City Council's Planning and Development Management Committee which is a separate process to the examination of the Proposed Local Development Plan. Any submissions made against that planning application were given due consideration in its assessment.

OP3 - Findlay Farm, Murcar

772: Support for allocation of OP3 Findlay Farm, Murcar is noted and welcomed.

OP4 - North Denmore

75, 128, 134, 143: OP4 has been allocated for development since the Aberdeen Local Plan 2008 (CDX). It is currently zoned for community facilities in the extant Local Development Plan 2017. Despite being marketed for a long time it has failed to be developed for the uses for which it is zoned (community facilities, local shops, primary school). The site has good drainage, with little risk of flooding and has scored well in most of the criteria as part of the Development Options Assessment (CDXX). The site is well connected to the existing settlement and the proposed residential use would fit in well in the surroundings. The Council support the proposal to develop housing on the site. The issues raised regarding loss of green/open space, access issues and increased traffic can be addressed through the planning application process. An element of open space would be expected to be included as part of any development and Proposed Policy NE2 (Open Space in New Development) would apply.

OP6 - WTR Site at Dubford

725: Support for allocation of OP6 WTR Site at Dubford is welcomed and noted. The precise number of homes deemed to be suitable for the site will be determined through the planning application process, taking into account relevant policies including Proposed Policy H3 - Density.

OP7 - Aberdeen College Gordon Centre

233: The Council agree that the woodland on this site should be retained. Policy NE5 Trees and Woodland will be applied at the planning application stage. In the 'Other Factors' column of Appendix 2 it states for OP7 Aberdeen College Gordon Centre that, "*the woodland on site, particularly along the site's boundaries, should be retained*".

OP8 - East Woodcroft North

506, 682, 919, 1141, 1147: OP8 East Woodcroft has been identified as an opportunity site for development since the 2008 Aberdeen Local Plan (CDX) when it was proposed for sheltered housing. It was discussed under Issue 7 (OP10) of the Report into the Aberdeen Local Development Plan Examination 2011 (CDX) when it was proposed for residential development. The principle of developing the site for residential uses has been established and it is not necessary to consider the principle of development on this site

again. The issues raised regarding loss of green/open space, access issues and increased traffic can be addressed through the planning application process. An element of open space would be expected to be included as part of any development and Proposed Policy NE2 -Open Space in New Development would apply.

OP9 - Grandhome

49, 53, 54, 89,130, 135, 917, 940, 1136, 1149, 1188: OP9 Grandhome has been identified for development since the Local Development Plan 2012 (CDX), and this allocation has included provision for a Gypsy Traveller site since this time. The site was discussed under Issue 5 (OP12) and the provision of Gypsy Traveller Sites was discussed under Issue 111 of the Report into the Examination of the Aberdeen Local Development Plan 2012 (CDX).

The site was carried over from the Aberdeen Local Development Plan 2012 into the extant Local Development Plan 2017 and again discussed in detail under Issue 3 (OP9) of the Report into the Aberdeen Local Development Plan Examination 2016 (CDX). The principle of developing the site as proposed has been established and it is not necessary to consider the principle of development on this site again.

OP9 Grandhome is at an advanced stage with planning consents in place and homes already being built out and occupied.

As mentioned, a traveller site has been part of the Grandhome proposal since it was first identified in the Local Development Plan 2012. Grandhome is one of 3 such sites identified in the Proposed Local Development Plan – the other two being at Newhills and Loirston. These 3 sites were chosen to provide a geographical spread of sites with one in the north (Grandhome), one to the west (Newhills) and Loirston to the south of Aberdeen.

880: The Grandhome Development Framework Part 1 (CDX) discusses the requirement for a pedestrian bridge on page 9: “*A future connection will be created in respect of the pedestrian and cycle bridge at Davidson’s Mill with others potentially being created elsewhere within the Don corridor.*” It is the Council’s view that an explicit mention of this is not required to be in the Plan itself, it is sufficient that it is discussed in the adopted Development Framework. The Section 75 legal agreement for the Grandhome development (application reference P131535 CDXX) includes a clause requiring the proprietors to pay a core path contribution. It is to be used towards the delivery of a pedestrian/cycle bridge at Davidson's Mills. The Section 75 legal agreement for the Davidson's Mill development (applications reference P110786 CDXX) also includes a pedestrian bridge contribution, which is to be used towards delivering the bridge.

959: OP9 Grandhome is subject to an approved Development Framework for the whole allocation which will be taken forward as Aberdeen Planning Guidance. Page 30 of the Proposed Local Development Plan discusses the key principles of the Development Framework. Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no locus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public, in the same way that consultation was undertaken on the current Supplementary Guidance. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that all stakeholders will be able to comment at the appropriate level of detail. Circular 6/2013 Development Planning (CDXX) outlines the benefit of non-statutory guidance is that it can be updated quickly to take account of any issues which

arises during the life cycle of the Plan. Although non-statutory guidance will not form part of the Development Plan, when adopted it will be a material consideration in decision making. It is the Council's view that the suggested amendments to the Plan proposed by respondent 959 are not necessary.

1150: Paragraph 11.25, page 93, of the Proposed Local Development Plan sets out a Summary of Transport Intervention Options. These options have resulted from the Cumulative Transport Appraisal 2018 (CD XX), which supported the Strategic Development Plan 2020 (CD XX) and are also set out in the Strategic Development Plan 2020's Schedule 1, page 49. The Cumulative Transport Appraisal 2018 (CD XX) included a number of interventions, considered in a regional context, which could aid the mitigation of increased transport movements resulting from the potential level of future development in the Strategic Development Plan 2020 (CD XX). The table of interventions was included in the Proposed Local Development Plan 2020 after discussions with Transport Scotland on a draft version of the Proposed Local Development Plan.

The allocation of OP9 Grandhome and subsequent planning permission for this site resulted from housing allowances set out in the Aberdeen City and Shire Structure Plan 2009 (CD XX) and the Aberdeen City and Shire Strategic Development Plan 2014 (CD XX). The potential transport impact of these strategic allocations was considered by the Cumulative Transport Assessment 2010 (CD XX). These allocations were included in the Local Development Plan 2012, the extant Local Development Plan 2017 and the Proposed Local Development Plan. Therefore, the Proposed Local Development Plan continues the Spatial Strategy of Aberdeen City's last two Local Development Plans. Many of the allocations have obtained planning permission and development is being delivered. The transportation interventions of the Cumulative Transport Appraisal 2010 (CD XX) were incorporated into the Strategic Development Plan 2014 (CD XX) in order to accommodate the levels of growth proposed in that Plan. The funding to deliver these interventions was, in part, to be met by the Strategic Development Plan 2014's Supplementary Guidance on the Strategic Transportation Fund (CD XX), now quashed. With the Strategic Transport Fund Supplementary Guidance (CD XX) quashed, no further contributions to the Strategic Transport Fund can be sought nor can they be claimed retroactively from previously approved developments. In the absence of a Strategic Transport Fund both Aberdeen City and Aberdeenshire Councils have required developers to undertake their own Transport Assessments to demonstrate that they can mitigate any strategic and local transport issues cause by their developments. This approach has allowed planning applications to be determined in the absence of the Supplementary Guidance for the wider economic benefit of the area on the basis of the consistent application of national guidance on transport assessments. This approach will continue to be applied to additional allocations within the Bridge of Don area.

OP10 - Dubford

37, 51, 96, 247: This is the remaining undeveloped part of the 550 home Dubford development (OP10 in the extant Local Development Plan 2017). OP10 Dubford has been identified for development since the Local Development Plan 2012 (CDX). The site was discussed in detail under Issue 6 (OP25) of the Report into the Examination of the Local Development Plan 2012 (CDX). The principle of developing the site for residential uses has been established and it is not necessary to consider the principle of development on this site again. At the time of allocation, impact on local infrastructure services such as schools and health care facilities were all taken into account and thoroughly assessed, these requirements have been updated as necessary over time to reflect changing school

rolls and the needs of the time of local health care facilities etc. The issues raised regarding loss of green/open space, access issues, increased traffic can be addressed through the planning application process. An element of open space would be expected to be included as part of any development and Proposed Policy NE2 - Open Space in New Development would apply.

OP11 - Balgownie Area 4

555: Support for allocation of site is welcomed and noted.

43, 848, 850: The site has been assessed as part of the Development Options Assessment Report (CDX) for rezoning from urban green space to residential uses. The site scores well, being southeast facing, well-sheltered with little risk of flooding. It is zoned in the extant Local Development Plan 2017 as Urban Green Space, as part of the Balgownie Playing Fields. This part of the playing fields is relatively small and not well used except for access. Its sporting potential is considered to be limited. It is adjacent to a recent housing development and access would be possible via Home Farm Road. The site is accessible and well connected to services and facilities. Residential use on this site is considered to be appropriate. Consideration needs to be given to a number of trees on the northern edge of the site and a fine sycamore (with Tree Preservation Order) to the west which will be taken into account at the planning application stage where Proposed Policy - NE5 Trees and Woodland will be applied. The issues raised regarding noise and dust, impact on local amenity, loss of daylight/overshadowing, impact on wildlife, road safety concerns, and increased traffic can be addressed through the planning application process.

OP12: Silverburn House

248: Support for allocation of the site is welcomed and noted.

772: On 21 January 2020, the Strategic Development Planning Authority received the Examination Report into the Proposed Strategic Development Plan (CDXX) for Aberdeen City and Aberdeenshire. The main issue arising from this was that the Housing Allowances for the period 2020-32 had been increased by 938 homes for both Aberdeen City and Aberdeenshire which have to be accommodated in both Local Development Plans. In response, 100 homes at OP12 Silverburn House have been identified. The site was subject to a development bid (B0232) to change this to residential. In this instance, the loss of this employment land is not considered critical at a time when there is a substantial supply of employment land around the City, as well as land identified for harbour related uses. The slight over-allocation of housing would ensure that, should any other sites be removed (for instance during the Examination), there is a lower risk of other less desirable and late stage sites being brought in as replacements.

1150: As discussed in commenting on OP2 Cloverhill, Paragraph 11.25, page 93, of the Proposed Local Development Plan sets out a Summary of Transport Intervention Options. These options have resulted from the Cumulative Transport Appraisal 2018 (CD XX), which supported the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) and are also set out in the Strategic Development Plan 2020's Schedule 1, page 49. The Cumulative Transport Appraisal 2018 (CD XX) included a number of interventions, considered in a regional context, which could aid the mitigation of increased transport movements resulting from the potential level of future development in the Strategic Development Plan 2020 (CD XX). The table of interventions was included in the Proposed

Local Development Plan after discussions with Transport Scotland on a draft version of the Proposed Local Development Plan.

The allocation of OP9 Grandhome and subsequent planning permission for this site resulted from housing allowances set out in the Aberdeen City and Shire Structure Plan 2009 (CD XX) and the Strategic Development Plan 2014 (CD XX). The potential transport impact of these strategic allocations was considered by the Cumulative Transport Assessment 2010 (CD XX). These allocations were included in the Local Development Plan 2012 (CDXX), the extant Local Development Plan 2017 (CDXX) and the Proposed Local Development Plan. Therefore, the Proposed Local Development Plan continues the Spatial Strategy of Aberdeen City's last two Local Development Plans. Many of the allocations have obtained planning permission and development is being delivered. The transportation interventions of the Cumulative Transport Appraisal 2010 (CD XX) were incorporated into the Strategic Development Plan 2014 (CD XX) in order to accommodate the levels of growth proposed in that Plan. The funding to deliver these interventions was, in part, to be met by the Strategic Development Plan 2014's Supplementary Guidance on the Strategic Transportation Fund (CD XX), now quashed. With the Strategic Transport Fund Supplementary Guidance (CD XX) quashed, no further contributions to the Strategic Transport Fund can be sought nor can they be claimed retroactively from previously approved developments. In the absence of a Strategic Transport Fund both Aberdeen City and Aberdeenshire Councils have required developers to undertake their own Transport Assessments, to demonstrate that they can mitigate any strategic and local transport issues cause by their developments. This approach has allowed planning applications to be determined in the absence of the Supplementary Guidance for the wider economic benefit of the area on the basis of the consistent application of national guidance on transport assessments. This approach will continue to be applied to additional allocations within the Bridge of Don area.

OP13 - AECC Bridge of Don

772: Support for the statement in the Proposed Local Development Plan which states that the development "*should respect the landscape setting and amenity of the course of the Royal Aberdeen Golf Club*" is welcomed and noted.

35, 172, 772: OP13 AECC Bridge of Don is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried over into the Proposed Local Development Plan. The concerns raised by respondents regarding the inclusion of a household waste recycling centre have been discussed previously within Issue 3 of the Report into the Examination of the Aberdeen Local Development Plan 2016 (CDX). The principle of development on this site and the inclusion of a household waste recycling centre have already been established and it is not necessary to consider these issues again. As previously concluded by the Council a recycling facility is required within the Bridge of Don area to replace the current facility on Scotstown Road which is not considered fit for purpose. Its replacement is a key priority within the Aberdeen City Waste Strategy 2014 – 2025 (CDX (pages 21 – 23)). Delivery of the facility at OP13 is within the control of the Council as landowner. The Council wish to ensure that these facilities are fit for purpose with an improved range of recycling options available to the public. The masterplanning process and any subsequent planning applications will consider detailed issues such as strategic landscaping and amenity of adjacent land uses. It is not considered appropriate to pre-empt the final decision regarding the location of the recycling centre by inclusion of text in the Proposed Local Development Plan relating to the golf course or proposed

strategic landscaping. There is a live planning application for this site (Reference P150824 (CDXX) which at the time of writing is pending consideration by the Planning Authority.

OP45 Berryhill

471: As discussed above as a result of the Report of Examination of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) and additional 938 homes were required to be allocated for Aberdeen City. In response a Proposed Local Development Plan was presented to Elected Members with a site of 1000 homes was identified at OP2 Murcar and 100 homes at OP12 Silverburn House. Both of these sites are already allocated for employment use and both were subject to development bids to change from employment to residential. Their allocation as residential would still leave a robust employment land supply in Aberdeen City.

In this instance, the loss of this employment land is not considered critical at a time when there is a substantial supply of employment land around the city, as well as land identified for harbour related uses. The allocation of slightly more than what is required by the Strategic Development Plan's Report of Examination would ensure that, should any other sites be removed (for instance during the Examination), there is a lower risk of other less desirable and late stage sites being brought in as replacements.

At the Full Council meeting on XX March 2020 Elected Members agreed to remove Berryhill from the OP2 Cloverhill and Berryhill site. This reduced the allocation from XXX homes to 550 homes and meant the redistribution of the 400 homes remaining to other sites across Aberdeen City. The Council approved the removal as it had concerns with the allocation for an additional 1000 plus homes in the Bridge of Don Community in addition to the other considerable allocations in the extant and Proposed Local Development Plan.

This redistribution aligns with paragraph 119 of Scottish Planning Policy 2014 (CD XX) in that the 938 homes required by the Examination into the Strategic Development Plan are spread across different areas of Aberdeen City to meet housing need and to deliver different sized sites to provide variation of choice, mix and continuity of supply.

772: Support noted.

Aspirational Core Path AP1

772: Aspirational Core Paths, such as AP1, are included in Aberdeen City Council's Core Paths Plan (CDX). They are paths that did not exist when the Core Paths Plan was written but are located where there is a longer-term aspiration to create them. In AP1's case this has not happened yet and so it remains an aspiration only at this time. When aspirational routes are formally created, they do not necessarily follow the exact line of the aspirational core path, this is simply a guide as to approximately where it was envisaged the route could go and where it could link. If AP1 were to be formally created on the ground the precise route would be investigated and site-specific considerations such as those raised here would be taken into account. The Core Paths Plan is mapped as part of the Proposed Local Development Plan for information and to provide context. The Core Path Plan itself cannot be altered by the Local Development Plan process, only a Core Paths Plan Review can add, change or remove Core Paths or Aspirational Core Paths. A Core

Paths Plan Review will likely be undertaken in the next few years and comments will be sought during this process from landowners, public bodies, the general public etc. to gather their views.

Reporter's conclusions:

Reporter's recommendations:

Issue 4	ALTERNATIVE SITES: BRIDGE OF DON / GRANDHOME	
Development plan reference:	No reference in Plan	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr A Adam (106) Karen Pratt (113) Mike Pratt (114) Kirsty Pratt (115) SGS Property Limited (191) Ali Bedawi (252) J and A F Davidson (471) The University of Aberdeen (555) Buccmoor LP (579) MJSM Developments Limited (725) Shell UK Limited (730) Stewart Milne Homes (744) Barratt North Scotland (781) Kemble Estates Ltd (792) Drum Property Group (859) Scotia Homes Ltd (964) Hartley Group (1107) Colin Fraser (1180)</p>		
Provision of the development plan to which the issue relates:	Alternative sites in Bridge of Don / Grandhome	
Planning authority's summary of the representation(s):		
<p><u>Support for Non-Allocation of Bid Sites</u></p> <p>113, 114, 115: Supports that the Proposed Local Development Plan does not include the below bid sites:</p> <ul style="list-style-type: none"> • B0203 Mundurno • B0209 West Dubford • B0210 Mundurno • B0211 Newton of Mundurno • B0213 Shielhill North and South • B0214 Shielhill South_ <p>730: Support undesirable status of B0101 Chapel Farm and B0109 Newton Farm and decision not to allocate in the Proposed Local Development Plan.</p> <p><u>New Bid Sites Not Submitted Prior to Proposed Local Development Plan Stage</u></p>		

106: Proposes land at Corsehill Farm as a site which should be included for residential development in the Proposed Local Development Plan. The site was not promoted as a development site previously and therefore was not included in the Main Issues Report. The respondent sets out why they consider it suitable for development.

191: Sets out why the site at Granitehill Terrace on the North side of the River Dee and South of OP9 Grandhome is suitable for allocation in the Proposed Local Development Plan. The site was not put forward as a bid site but was a previously an allocated site in the Aberdeen Local Development Plan 2012 (OP13). The respondent asserts that particular focus should be given to: - the aims of the Green Belt, as set out in paragraph 6.5 of the Proposed Aberdeen Local Development Plan and paragraph 49 of Scottish Planning Policy 2014; - the planning history of the site and the immediately surrounding area, in particular the fact that there has been a history of previous development and the site was previously allocated in the Local Development Plan 2012. In addition, there have been recent consents to the north of the site which could be considered to support the principle of development in the area. The allocation of this site would allow offer an additional mix of housing sites as encouraged by the Aberdeen City and Shire Strategic Development Plan 2020. There is additional site specific information in support of the site however it would appear that this was not submitted during the Call For Sites or during the Main Issues Report consultation.

252: Allocate 2.3 hectares of land adjacent to Old Ellon Road, Murcar as Strategic Employment Land for the period 2033 – 2040. The site will not undermine the aims of the Green Belt, it would direct employment to an appropriate location and would allow for improved landscape setting on approaching the city. Development would not impact on the Green Space Network. The site is a small-scale extension to OP1. Site would contribute to the Energetica Corridor. The Development Option assessment of the 2014 Bid for the extant Local Development Plan 2017 notes the site could be a natural extension of the employment land at Mucar. Site relates well to other employment, housing and commercial units in the area. Due to the small size of the site there is no requirement to remove employment land allocations from any other site.

792: Respondent requests that land to the west of OP13 (site plan included in full representation) is removed from Policy B1 designation and re-zoned as Mixed Use and as an extension to OP13. Respondent argues that an overly restrictive Business policy has left this and other employment zonings vacant.

Bid Site B0103 - Bleachfield House

1107: Support Bid Site B0103 - Bleachfield House as an allocation in the Proposed Local Development Plan. The respondent considers that this is an untidy and problematic site. A well designed, carefully controlled, modestly sized, mixed use development would transform the site into a substantial amenity for the local and wider community. The respondent also considers the site's assessment through the Main Issues Report, which scored relatively highly, is incongruous as it was considered by the Council as undesirable. The respondent also asserts that the site aligns with the Proposed Local Development Plan's Spatial Strategy, the Aberdeen City and Shire Strategic Development Plan 2020 Spatial Strategy and would align with Scottish Planning Policy in its development of a brownfield site.

Bid Site B0205 - Aberdeen Energy Park

579: Object to the failure to rezone site as B1: Business and Industry. The Aberdeen Energy Park is not attracting investors. Zoning to Policy B1 would increase the range of uses allowed onsite. The concept of the Energy Park is no longer relevant as there has been a move away from oil and gas and drive towards diversification. To meet the need to diversify the zoning needs to change. The Park in split into two policy zonings. The extension to the Park is zoned as B1, while the original Park area is zoned as B2, leading to confusion, delays and uncertainty when letting different areas of the site. The restrictive nature of Policy B2 within the Proposed Local Development Plan gives further justification for rezoning as Policy B1. This will lead to further investment along a Strategy Growth Area. B1 allocation would support the new housing allocations in the area, Silverburn House and Cloverhill.

Bid Site B0210 - Mundurno

744: Object to the non-allocation of the site. Site should be identified for a phased residential led mixed use development comprising 1,000 units of mixed housing type and local centre containing retail, health, business and community uses. Site should be allocated to ensure a five-year Housing Land Supply is in place at the end of the Proposed Local Development Plan period. The site is on the edge of the City, and would enhance the balance between employment and residential in the area.

Bid Site B0211 - Newton of Mundurno

744: Object to the non-allocation of the site. The site should be identified for a phased residential led mixed use development comprising 1,000 units of mixed housing type and local centre containing retail, health, business and community uses, and primary school if necessary. Site should be allocated to ensure a five-year Housing Land Supply is in place at the end of the Proposed Local Development Plan period. The site is on the edge of the City, would enhance the balance between employment and residential in the area.

Bid Site B0214 - Shielhill South

964: Site submitted in Call for Sites in May 2018. The part of the site which was sand and gravel quarry is now decommissioned. It is now brownfield and has been marketed with no interest. The remainder of site is on a short term let due to end by adoption of the Proposed Local Development Plan. The site should be allocated for housing because of unlikelihood of being re-let for existing business uses. Allocation of the site will allow consideration of heavy goods vehicle prohibition in the area. Respondent notes the Development Options Assessment Report and disagrees with Officer's comments that development will intrude into countryside and have a negative landscape impact. Removal of site from Green Belt will contribute to reasons for Green Belt designation as set out in Scottish Planning Policy. Development will include a tree belt that would create a robust Green Belt boundary in accordance with Scottish Planning Policy. The proposed allocation would not extend development beyond brownfield land. The developer has a good track record of delivery in the area including adjacent Dubford site. The developer will commission a case study for a Farm Co-operative led mixed use development on the site. The brownfield nature of the site and oversupply of employment land should be considered.

Bid Site B0218 - Causewayend

859: Objects to non allocation of B0218 Causeway End as an allocation for residential housing in the Proposed Local Development Plan. The respondent disputes the Development Options Assessment of the site and sets out counter arguments as to why this flawed. The respondent also asserts the allocation is required in order to meet the Housing Allowances as set in the Aberdeen City and Shire Strategic Development Plan 2020.

Bid Site B0219 - Perwinnes

859: Objects to non allocation of B0219 Perwinnes. Site should be allocated for 3-4000 homes as Strategic Reserve Housing Land and mixed use.

Bis Site B0229 – Site adjacent to Persley Croft

1180: Objects to non allocation of B0229. Site is not prominent due to landscape, trees, topography and existing buildings surrounding the site. Site is already classed as brownfield.

Bid Site B0231 – Balgownie Area 2

555: Objects to failure to identify site for residential development. The representation should be considered alongside the development bid submitted at the Pre-Main Issues Report (/Call For Sites) stage for employment uses. The Main Issues Report bid proposed residential use on site because employment use was undesirable. Indicative Masterplan attached. Site B0221 along with adjoining Campus One land should be identified for residential use. Proposed use would not conflict with existing business uses to the northeast and would complement residential uses on Balgownie Drive. The previous Local Development Plan Examination concluded the site has no landscape value. The site is only available for University use, which is low. Its loss would not impact capacity for wider community sport. Funds from development would be used to upgrade sports facilities north of site for the community. Sports Village provides a modern facility for the city. There are future development plans to meet growing demand. Balgownie pitches are surplus to requirements. Questions use of 1996 Landscape Character Assessment. Development will retain existing landscaping and include new planting to encourage biodiversity. Development will integrate well within the landscape. Pre-Main Issues Report (/ Call For Sites) and Main Issues Report submissions attached.

Bid Site B0234 - WTR Site Extension

725: Bid B0234 is put forward for development. Allocating the larger site would deliver the same benefits as the allocation of OP6 but with additional and needed housing in a sustainable location. Extended site should be allocated for residential development of around 38 units. The extension would be on brownfield land in accordance with national and regional policy to utilise brownfield before greenfield and make sustainable use of land. Land is flat, well sheltered and contained within landscape. Scope to create direct footpath connections to development at Dubford and enhance connections to Scotstown Moor. Development of the site provides opportunity to introduce native planting and enhance biodiversity value. The scale of allocation allows for delivery of a choice of housing within the life of the emerging Local Development Plan. Comments relating to Development Options Assessment Report where the site was given a score less than the maximum of 3 with regards to exposure/aspect/slope, natural conservation, landscape features, landscape fit, land use mix/balance/service thresholds, accessibility,

proximity to facilities, shopping/health/recreation, footpath/cycle connections, service infrastructure capacity and other constraints. Allocation would have no significant impact on other proposed allocations or require removal of sites to accommodate especially as numbers are indicative. Allocation would ensure a mix of site sizes are identified and would provide an opportunity for the delivery of a range of house types/tenures within the timescale of the Proposed Local Development Plan. Response to Call For Sites and response to Main Issues Report submitted with representation.

Bid Site B0235 - Campus One, Aberdeen Innovation Park

579: Object to the failure to allocate residential use. Plots to the south west of Campus one and adjoining land owned by University of Aberdeen should be identified as an opportunity site. Site for 40 units, with cumulative total of 120 units. Plots are secluded, in a mature setting and there would be no conflict of interest with the existing Class 4 Business use, or wider surrounding residential use. No infrastructure constraints. Rezoning would be compatible with paragraph 103 of Scottish Planning Policy. This is a sustainable use of land, with minimum impact on the surrounding area.

OP45 - Berryhill

471: Concerned by the Council's decision to remove Berryhill (OP45) from the housing allocation for the Proposed Local Development Plan and leave Cloverhill as a standalone housing site. Respondent owns land at Berryhill and raises concerns about safely running their farm at Berryhill if it is not included in the housing allocation. The dual carriageway would cut off OP2 - Cloverhill meaning that people would have to walk through the respondents land in order to access the shops at Murcar. This could render the fields unusable for growing crops or safely grazing cattle. Respondent believes that Berryhill has advantages over OP2 - Cloverhill on its own. Berryhill already has good access roads, and access is available off the Murcar roundabout. There are existing foot and cycle paths and it is close to shops and services at Murcar. Allocating the whole site would allow for masterplanning, affordable housing, shops, schools and leisure facilities which is what is needed in Bridge of Don. Respondent also wishes to see a cycle path established along the side of the A92 from the Berryhill site linking through to Blackdog.

781: Respondent objects to the failure to allocate OP2A Berryhill (respondent refers to the southern half of OP45 Berryhill as OP2A Berryhill - map shown in full representation) as an opportunity site in the Proposed Local Development Plan. This land was proposed as part of a wider residential area along with OP2 Cloverhill for 1000 homes. Respondent includes several supporting documents.

Modifications sought by those submitting representations:

New Bid Sites Not Submitted Prior to Proposed Local Development Plan Stage

106: Land at Corsehill Farm should be included for residential development in the Proposed Local Development Plan.

191: Allocate land at Granitehill Terrace for the development of 12 homes in the Proposed Local Development Plan.

252: Allocate 2.3 hectares of land adjacent to Old Ellon Road, Murcar as Strategic Employment Land for the period 2033 – 2040.

Bid Site B0103 - Bleachfield House

1107: Amend the Proposed Local Development Site to include Bid Site B01/03 Bleachfield House as a proposed development site to provide a modest mixed-use development on brownfield land.

Bid Site B0205 - Aberdeen Energy Park

579: The current B2 – Business Zoning allocation covering the Aberdeen Energy Park at Bridge of Don should be replaced with B1 – Business and Industry allocation in the Local Development Plan.

Bid Site - B0210 Mundurno

744: Include site in Appendix 2. Update Table 3: New Housing Allocations for 2020-2032. Add text to 'Growing Aberdeen' section of the Plan as a planned expansion of Bridge of Don.

Bid Site B0211 - Newton of Mundurno

744: Include site in Appendix 2. Update Table 3: New Housing Allocations for 2020-2032. Add text to 'Growing Aberdeen' section of the plan as a planned expansion of Bridge of Don.

Bid Site B0214 - Shielhill South

964: Include B0214 - Shielhill South with revised boundary (shown in the Main Issues Report response) as an opportunity site for residential-led mixed-use development of 100 units.

Bid Site B0218 - Causewayend

859: Allocate site for residential development, amend proposal map.

Bid Site B0219 - Perwinnes

859: Amend the Proposed Local Development Plan so that Perwinnes is allocated as future Strategic Reserve housing land for 3,000 to 4,000 new homes and mixed-use. Amend City Wide Proposal Map to reflect.

Bid Site B0231 - Balgownie Area 2

555: Remove Urban Green Space and Green Space Network designations from B0231 and identify site along with the adjacent Campus one site as an Opportunity Site for residential development.

Bid Site B0234 - WTR Site Extension

725: Allocate site for residential development of around 38 units.

Bid Site B0235 - Campus One, Aberdeen Innovation Park

579: Part of the site should be rezoned and identified as an Opportunity Site for residential development in conjunction with the adjoining land at Balgownie Playing fields owned by the University of Aberdeen. Table 3: New Housing Allocations and Appendix 2: Opportunity Sites should be amended to take account of this change.

OP45 - Berryhill

781: Insert new site in Table 3 New Housing Allocations for 2020-32 to reflect OP2A Berryhill as an opportunity for 450 homes. Modify Appendix 2 Opportunity Sites and insert new site to reflect OP2A Berryhill under a Residential zoning. Modify the City Wide Proposals Map to identify the area as Residential (H1). Modify the Environmental Report Appendix 6 to include OP2A as a 'Desirable Site'.

Summary of responses (including reasons) by planning authority:

Support for Non-Allocation of Bid Sites

113, 114, 115, 730: Support for non-allocation of Bid Sites B0203 Mundurno, B0209 West Dubford, B0210 Mundurno, B0211 Newton of Mundurno, B0213 Shielhill North and South, B0214 Shielhill South, B0101 Chapel Farm and B0109 Newton Farm is welcomed and noted.

New Bid Sites Not Submitted Prior to Proposed Local Development Plan Stage

For all new Bid Sites that were not previously submitted prior to the Proposed Local Development Plan stage the following statement applies. These sites were not put forward as development bids so were not considered as such at the Main Issues Report stage, nor subject to site assessment and public consultation. In addition, as demonstrated in Issue 1: Vision, Spatial Strategy and Land Release Policy LR1 and Issue 2: Housing Land there is an appropriate and sufficient supply of deliverable housing and employment sites within Aberdeen City. Therefore, it is the Council's view that no change is required for the new sites put forward by representees 106, 191, 252 and 792.

106: The Council does not support allocating new site Land at Corsehill Farm for residential development for the reasons stated above.

191: The Council does not support allocating new site Granitehill Terrace for residential development for the reasons stated above. In addition, although Granitehill Terrace was previously allocated for residential development in the Local Development Plan 2012 (CDXX) as part of OP13 Land for Persley, in the extant Local Development Plan 2017 (CDXX) it is zoned as Green Belt with no opportunity site identified.

252: The Council does not support allocating new site Old Ellon Road, Murcar as an extension to OP1 for Strategic Employment Land for the period 2022-2040 for the reasons stated above.

792: The Council does not support rezoning the land to the west of OP13 from Policy B1 designation to Mixed Use for the reasons stated above. In addition, this area of land forms part of a larger area of Business and Industrial Land that serves the north of the city.

Sites Previously Submitted for Assessment

The following representations are on sites that have been previously assessed prior to the Proposed Local Development Plan stage. In preparing the Proposed Local Development Plan a Development Options Assessment (CDXX), Strategic Environmental Assessment (CDXX), and Main Issues Report (CDXX) were used to identify the most suitable locations to deliver the required growth. A number of greenfield sites identified in the Proposed Local Development Plan have been carried over from the extant Local Development Plan 2017 (CDXX) which went through a similar site assessment process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Delivery Programme (CDXX).

The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) sets the requirements for greenfield housing and employment land allowances and these are set out in Table 3 and Table 4 of the Strategic Development Plan. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX), and is reflected within the Proposed Local Development Plan Spatial Strategy. Paragraph 4.18 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states, "*new allocations should consider opportunities to reuse brownfield land and attempt to utilise the current "constrained" supply in the first instance. However; it is likely that some new development will need to take place on greenfield sites in order to help deliver the Vision and future strategy for growth...Allocations should be of a scale which would not inhibit the delivery of current strategic allocations and should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise*". There is also a requirement for at least 40% of all new housing in Aberdeen City to be on brownfield sites as per Strategic Development Plan page XX.

Under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 greenfield requirements have been fully met and we are confident that a continuous five year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan.

Bid Site - B0103 Bleachfield House

1107: This site is reasonably connected to the Grandholm area, however, access in and out of the site would be difficult (through a narrow road). The Council notes that there is existing built development onsite, however taking into consideration the various uses proposed, they could generate a considerable amount of traffic. The presence of trees, the possibility of flooding and poor accessibility are factors which will limit the amount and type of development that is likely to be acceptable on this site, particularly in respect of housing. Whilst converting or replacing the building to small scale retail, office and cultural uses would benefit the area, such a development is unlikely to be viable. No change is required.

Bid Site B0205 - Aberdeen Energy Park

579: The business park currently has 16.4 hectares of undeveloped land, most of which is located on the Energy Park extension area (zoned as OP3 – Findlay Farm/Murcar in the

extant Local Development Plan 2017). 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. The recent oil downturn has had a negative impact on demand for Class 4 office space. However, the same could be said for industrial uses. This is a high-quality business park in an attractive coastal setting alongside a golf course. In addition, adjacent site OP13 AECC Bridge of Don is zoned for mixed use and is likely to come forward for residential elements. Rezoning this site would impact on the amenity of future residential uses. The current Specialist Employment zoning is therefore considered to be appropriate.

Bid Site B0210 - Mundurno

744: This site is isolated from the existing settlement of Denmore by distance, the busy B999 and topographical changes. Local Primary schools could not cater for the demand generated by a development of this size, thereby necessitating a new school (CDXX – Scholl Roll Forecasts). It is unlikely this scale of development could support the necessary neighbourhood facilities and services to significantly reduce residents' need to travel. Non-motorised linkages to other areas outwith the site would require substantial improvements to provide a realistic, safe and attractive alternative to cars. The site was considered during the Examination into the Local Development Plan 2012 (Issue X of CDX) and extant Local Development Plan 2017 (Issue X of CDX). The Reporters concluded that current Green Belt boundaries along the B999 and Shielhill Road are robust and defensible, and that the Green Belt status of the land at Mundurno is appropriate and contributes to the landscape setting of Aberdeen. Such extensive development would sprawl and intrude into the open countryside and have an unacceptable impact on the landscape setting of the city. It is considered that the Green Belt status of Mundurno is still appropriate therefore making this site undesirable for development.

Bid Site B0211 - Newton of Mundurno

744: This site performs Green Belt functions by contributing to the identity and landscape setting of the city and preventing coalescence between Bridge of Don and Potterton. Development on the site would introduce alien elements into a landscape which has the character of open farmland. The site is isolated from the existing settlements of Denmore by distance, the busy B999 and topographical changes. In addition, development on the site would be interrupted by the B999 and Aberdeen Western Peripheral Route. Local Primary schools could not cater for the demand generated by a development of this size, thereby necessitating a new school (CDXX – Scholl Roll Forecasts). It is unlikely this scale of development could support the necessary neighbourhood facilities and services to significantly reduce residents' need to travel. Non-motorised linkages to other areas outwith the site would require substantial improvements to provide a realistic, safe and attractive alternative to cars. The site is visible from areas of the City to the south, and from those travelling along the B999 and Aberdeen Western Peripheral Route. It is felt that the current Green Belt boundaries along the B999 and Aberdeen Western Peripheral Route are robust and defensible, and that the Green Belt status of the land at Newton of Mundurno is appropriate and contributes to the landscape setting of Aberdeen. Such extensive development would sprawl and intrude into the open countryside and have an unacceptable impact on the landscape setting of the city making this site undesirable for development.

Bid Site B0214 - Shielhill South

964: Located within the Green Belt within a green space buffer between Bridge of Don and Potterton, the Green Belt function in this vicinity helps protect the identity of both areas. Development at this location would lead to urban sprawl. Although the site is within proximity to Dubford, access to public transport is still poor and existing facilities are relatively distant. Part of the site was considered during the Examination into the extant Local Development Plan 2017 at Issue X (CDX). The Reporters concluded that the Green Belt status of the land at Shielhill is appropriate and contributes to the landscape setting of Aberdeen. The current Shielhill Road is an easily identifiable and robust Green Belt boundary in this area. Residential development would intrude into the open countryside and have an unacceptable impact on the landscape setting of the city.

Bid Site B0218 - Causewayend

859: Development on this site would encroach onto the Green Belt and would potentially result in the loss of Ancient Woodland which helps to screen the residential area of Bridge of Don from Scotstown Road. The site was considered at the Examination into the extant Local Development Plan 2017 (Issue X of CDX) where the Reporters concluded as follows: *“The site is significantly more prominent in views from the north than the existing housing areas at Middleton Park, which are largely screened in approaches to the city on the B997. Development would therefore constitute a significant urban extension into open countryside. While the B997 and existing tree belts would provide a strong Green Belt boundary around parts of the proposed development, much of the southern boundary consists of a relatively weak field boundary. The site is distant from most local facilities.”* These circumstances have not changed since then, and it is considered that the site should remain as Green Belt.

Bid Site B0219 - Perwinnes

859: This site is a landmark that provides a green backdrop to development at Bridge of Don and helps to contain it. Other than the Mundurno Burn and former sand and gravel pit at Leuchlands which forms a distinctive mound to the east, there are no other significant features in the area which could be used to form a strong Green Belt boundary. The site is poor in access terms, although it may be large enough to support its own services and facilities (including new schools) and public transport. This may help to reduce car dependence. However, development breaking out over the lower ground to the south before climbing up Perwinnes Hill would add to a sense of urban sprawl and isolation unconnected to the existing urban area. This site was considered during the Examination into the Local Development Plan 2012 (under Issue X of CDX) and extant Local Development Plan 2017 (under Issue X of CDX). The Reporters concluded that the Green Belt status of the land at Perwinnes is appropriate as it helps contain the northern part of Aberdeen in landscape terms. Its development would be a major incursion into open countryside and significantly affect the landscape of the city. These circumstances have not changed since then, and it is considered that the site should remain as Green Belt.

Bid Site B0229 – Site Adjacent to Persley Park

1180: The site is subject to significant constraints regarding access. The site is considered to be undesirable for development due to its location directly on the A92 trunk road (The Parkway), which is a major transport route. The Parkway severs the site from nearby residential development, service and facilities at Danestone, and would be very difficult and hazardous to cross for pedestrians and cyclists. The Parkway is a robust Green Belt boundary in this area. Considering the plans for development of 7,000 homes and 5 hectares of employment land at OP9 Grandhome, it cannot be assumed that this road will remain a significantly quieter local road even with completion of the Aberdeen Western Peripheral Route.

Bid Site B0231 – Balgownie Area 2

555: This site proposes residential development for 80 homes (but a total of 120 homes when developed in conjunction with Bid Site B0235). There is an intrinsic relationship between the two bid sites for both construction and access. It is zoned in the extant Local Development Plan 2017 (CDXX) as Urban Green Space and Green Space Network, as part of the Balgownie Playing Fields. Designated species have been identified within the vicinity of the site. This part of the playing fields appears to be well used and maintained with fresh line markings. Given that additional residential numbers are not required it is felt that this site is not suitable for development.

Bid Site B0234 - WTR Site Extension

725: The northern part of the site was previously assessed under B0208 and deemed to be desirable based on the previous proposal for limited housing development on a brownfield, low lying, low risk of flooding and good drainage site. It has been allocated as OP6 WTR Site in the Proposed Local Development Plan. Whilst the northerly section of the site remains desirable, there is no justified merit in an extension into land which poses risk to loss and disturbance of wildlife habitat and both designated and protected species in the Scotstown Moor/Perwinnes Moss Local Nature Conservation Site (CDXX) and potential loss of recreational routes well used by residents. The historic structures identified to the south of the site (outwith the extension area) does not justify treating the extension part of the site as brownfield.

Bid Site B0235 - Campus One, Aberdeen Innovation Park

579: The site proposes residential development for 40 homes (but a total of 120 homes when developed in conjunction with Bid Site B0231). The site is south facing, well sheltered, but has potential for drainage issues and has a steeper slope running southwards. Whilst the potential residential use would not necessarily conflict with the employment uses, the potential for erosion to the specialist nature of the employment area is considered a land use conflict. The site itself is relatively disconnected to nearby facilities. Designated species have been identified within the vicinity of the site. Given that additional residential numbers are not required it is felt that this site is not suitable for development.

OP45 - Berryhill

471, 781: As a result the Report of Examination of the Proposed Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) an additional 938 homes were required to be

allocated for Aberdeen City. In response, a Proposed Local Development Plan was presented to Elected Members with a site of 1000 homes was identified at OP2 Murcar and 100 homes at OP12 Silverburn House. Both of these sites are already allocated for employment use and both were subject to development bids to change from employment to residential. Their allocation as residential would still leave a robust employment land supply in Aberdeen City.

In this instance, the loss of this employment land is not considered critical at a time when there is a substantial supply of employment land around the City, as well as land identified for harbour related uses. The allocation of slightly more than what is required by the Strategic Development Plan's report of examination would ensure that, should any other sites be removed (for instance during the Examination), there is a lower risk of other less desirable and late stage sites being brought in as replacements.

At the Full Council meeting of XX March 2020, Elected Members agreed to remove Berryhill from OP2 Cloverhill and Berryhill site (CDXX – Minute of Meeting). This reduced the allocation to 550 homes and meant the redistribution of the 400 homes remaining to other sites across Aberdeen City. The Council approved the removal as it had concerns with the allocation for an additional 1000 plus homes in the Bridge of Don Community in addition to the considerable allocations in the extant and Proposed Local Development Plans.

This redistribution aligns with paragraph 119 of the Scottish Planning Policy 2014 (CD XX) in that the 938 homes are spread across different areas of Aberdeen City to meet housing need and to deliver different sized sites to provide variation of choice, mix and continuity of supply.

Reporter's conclusions:

Reporter's recommendations:

Issue 5	ALLOCATED SITES AND GENERAL AREA STRATEGY: DYCE, BUCKSBURN AND WOODSIDE	
Development plan reference:	Pages 23, 38 - 39, Appendix 2, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Ashley and Eileen Barber (39) Eileen Wilson (40), Rebecca Duncan (63) Evelyn Clark (67) Kathleen Adams (71) Louise Mckimmie (79) Kevin Stephen (83) Ms Irene Anderson (94) Calum Benzies (103) Scott Jessieman (107) Agnes Esson (136) Phil Groundwater (154) Sandra Rae (171) Hugh Cumming (174) Aberdeen and District Angling Association (236) Scott Jessiman (253) Mr and Mrs F Cook (274) Arne Bjorkvoll (412) Trevor Strong (531) Fiona Wilson (540) James Milton (544) Stewart Milne Homes (717) Allan and Vivien King (773) NHS Grampian (882) Lynda Chadwick (1022) Mrs Sheena Dow (1051) Gavin Grant (1069) Dyce and Stoneywood Community Council (1079) Colin Gibb (1083) Susan Darcy (1098)</p>		
Provision of the development plan to which the issue relates:	Opportunity Sites in Dyce, Bucksburn and Woodside	
Planning authority's summary of the representation(s):		
<p><u>OP14 - Cordyce School</u></p> <p>136: Objects to residential development. Better developed as a medical centre and green space.</p>		

236: Least desirable housing site due to proximity to Lower Parkhill fishing. Potential disturbance and pollution from development.

1022: Supports development, but requests it is developed as community uses instead of residential. Concerned about lack of housing demand, impact on orchard, park, wildlife and loss of green space. Land behind the orchard is prone to flooding. Exposed site.

1051: Site should be allocated for a garden centre - this will benefit entire community, support existing wildlife and has links to the schools. Accessible site by active travel. Photos of local wildlife included.

1079: Object to allocation. Will result in 'growth creep' along the Green Belt strip beside the river.

OP15 - Former Carden School

1069: Concerns about proximity of development to school, road infrastructure capacity, increased traffic congestion, pupil safety issues and loss of privacy for surrounding residents.

OP17 - Former Bucksburn Primary School

71: Objects to development. Loss of green space.

882: Healthcare provision is no longer required at this location. Site should be removed from the Local Development Plan.

OP20 - Craibstone South

40: Proposed scale of development in Dyce, Bucksburn and Woodside areas will result in additional traffic.

154: Cumulative impact of OP28, OP33, OP20, OP21 and OP22 will reduce deer habitat and result in accidents on the Aberdeen Western Peripheral Route.

OP21 - Rowett South

40: Proposed scale of development in Dyce, Bucksburn and Woodside areas will result in additional traffic.

103: Objects to further development. Development has resulted in loss of habitat.

154: Cumulative impact of OP28, OP33, OP20, OP21 and OP22 will reduce deer habitat and result in accidents on the Aberdeen Western Peripheral Route.

531: Concerns about school capacity, additional traffic on existing communities and road infrastructure. Requests traffic be directed onto main trunk roads, introduction of traffic calming measures and a ban on construction traffic in existing residential areas.

OP22 - Greenferns Landward

83: The respondent does not support the development of OP22 Greenferns on what they consider to be Green Belt land for the development of housing. The respondent states that the land was given to Aberdeen City Council under the Common Good Fund and that developing it for housing would not be in the spirit of the Fund.

154: Cumulative impact of OP28, OP33, OP20, OP21 and OP22 will reduce deer habitat and result in accidents on the Aberdeen Western Peripheral Route.

717: Remove site from the Proposed Local Development Plan - it has been identified since 2004. Concerns about delivery. No planning consent. Constrained site in the Housing Land Audit 2019 and Draft Housing Land Audit 2020. Site may not come forward until post 2032. Allocation contradicts paragraph 119 in Scottish Planning Policy. Replace with deliverable site.

OP24 - Central Park, Dyce

Support

773, 1079: Agree new health centre is needed.

882: Welcome inclusion of site for a new medical centre.

Objections

63: Loss of personal privacy and overshadowing from building. Queries whether an alternative site opposite the health centre could be used - houses are further away and would have minimal impact from light and noise issues.

253, 274, 412, 544, 1083, 1098: Concern over loss of green space. Development should be on existing site or other brownfield locations.

63, 253, 274, 412: Concerns about pedestrian safety, anti-social behaviour and additional traffic.

253: Development will set precedent for removal of green space.

773: Concern over loss of Green Belt.

63, 773, 1083: Concern over Impact on wildlife

274, 412, 773, 1083: Concern over loss of recreation area for community. Potential parking issues.

412: Concern over detrimental impact on property prices.

412, 540, 544, 773, 1083, 1098: Restricts existing footpath access to food retail, bus station and schools.

544: Neighbour notification does not give a detailed explanation of the proposal.

1083: Development contradicts Scottish Government Planning Policy Guidance. Potential increased flood risk to nearby homes. Potential overlooking into existing private areas.

1098: Concerned about removal of paths/green space and impact on health and active travel. Discontent with alternative provision of green space on site of existing health centre.

OP86 – Dyce Railway Station Objections

39, 67, 79, 94, 107, 174: Concern over loss of green space.

39, 67, 79, 94, 171: Road network has no capacity for additional traffic.

67, 79: Unreasonable site access. Further information on Sustainable Urban Drainage Systems, fencing and street lighting required. Access to Formartine Way and Buchan Way should be maintained.

67, 79, 174: Concern over impacts on landscape and residential amenity.

67, 79, 171: Concerns over pedestrian safety.

67: Transport Assessment required. Respondent states if the Council fails to consider her comments, a formal complaint will be made to the Scottish Government.

94: More suitable sites should be assessed. Development will have detrimental impact on amenity and quality of life.

107, 171: Location will result in anti-social behaviour.

107: Queries why existing site cannot be redeveloped and why B0110 was unacceptable. Queries why Cordyce School was not considered.

171: Increased light and (174) noise pollution.

174: Loss of habitat. Low parking uptake at Craibstone Park and Choose facility and falling passenger numbers highlight no need for additional parking at Dyce Station.

1079: Notes the proposal will encourage sustainable transport however requests potential loss of green space is quantified and impact of traffic on Station Road, Dyce is assessed.

Modifications sought by those submitting representations:

OP14 - Cordyce School

136: Develop as a medical centre and green space area.

236: Remove option for housing.

1051: Option for a garden centre, health centre or sheltered housing would be acceptable.

1079: Retain site as Green Belt / Green Space Network.

OP15 – Former Carden School

1069: Retain site for educational use. Renovate existing building.

OP17 – Former Bucksburn School

71: Site should be used as a car park.

882: Amend OP17 to remove reference to healthcare provision.

OP21 - Rowett South

103: Develop shops or facilities rather than more houses.

OP22 - Greenferns Landward

83: Do not use Green Belt and Common Good Fund land for development. Find alternative brownfield sites.

717: Remove site from the Proposed Local Development Plan and insert an alternative site for residential development – for example Gillahill, Huxterstone, Contlaw, Newton of Mundurno or Mundurno

OP24 – Central Park, Dyce

253: Use brownfield site.

544: Construct new health centre near the existing one.

540, 1098: Leave surgery where it is. Redevelop at existing site.

540, 1083, 1098: Select alternative sites such as former Carden School or former Cordyce School.

1098: Use alternative locations in Dyce e.g., Stoneywood School or vacant industrial site.

OP86 – Dyce Railway Station

79, 94, 171, 174: Remove site from Plan.

79: Undertake a green Transport Assessment of Dyce Village. Look for brownfield sites for a train station car park.

Summary of responses (including reasons) by planning authority:

OP14 - Cordyce School

1022: Support for development at this Opportunity Site (OP Site) is noted and welcomed.

136, 236, 1022, 1051, 1079: The footprint of the Former Cordyce School, along with the higher land immediately behind it (looking from the south), is largely free from constraints, and much of it is brownfield. The site benefits from being well-connected and presents a sustainable development opportunity within an attractive setting. Cordyce School has been zoned in the Proposed Local Development Plan for mixed uses which include

housing, a garden centre and fitness village. Were a planning application brought forward for any of these uses, either on their own or in combination, it would be considered to be in keeping with the principle of development designed in the Proposed Local Development Plan. Any proposal would then be subject to the Development Management process. Appendix 2 in the Proposed Local Development Plan states that any development should avoid harmful impacts on the community orchard. In addition, any planning application would also be assessed against Proposed Policies NE1 – Green Belt and NE2 – Green and Blue Infrastructure, which covers Green Space Network. During the Pre-Main Issues Report stage, there was an NHS proposal for a health centre on this site. This has since been withdrawn and an alternative site has been allocated for a health centre in Dyce (OP24 Central Park). This is dealt with later in this Issue.

OP15 - Former Carden School

1069: Former Carden School has been allocated in the extant Local Development Plan 2017 (CDXX) and the Local Development Plan 2012 (CDXX). This allocation has been carried forward to the Proposed Local Development Plan. The concerns raised by the respondent are noted. This site has been assessed as part of the Strategic Environmental Assessment (CDXX). The site is accessible from Gordon Terrace and the existing road network would be capable of accommodating traffic from residential uses. Development would provide residential uses on a brownfield site which is already connected to suitable infrastructure. Issues raised regarding loss of privacy for surrounding residents can be considered through the planning application process.

OP17 - Former Bucksburn Primary School

71: It would not be appropriate to use the site for parking that is unrelated to a specific development. Proposed Policy T3 Parking states that any proposals for parking that are not directly related to new developments will not be supported. The issue raised regarding loss of green space can be considered through the planning application process. An element of open space would be expected to be included as part of any development and Proposed Policy NE2 - Open Space in New Development would apply.

882: The Council appreciates that healthcare provision is no longer required at this location. Development of the site would bring a brownfield site back in to use, which the Proposed Local Development Plan wholly encourages. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states that new housing allocations should reuse brownfield land and attempt to utilise the current constrained supply in the first instance. The Former Bucksburn Primary School site has been zoned for residential uses and as such is suitable for any uses which are compatible with a residential area and this may include healthcare or community uses.

Newhills General

40, 103, 154, 531: OP20, OP21 and OP22, are part of the approved Newhills Development Framework (CDXX) which the Council proposes to take forward as Aberdeen Planning Guidance further to the adoption of the Proposed Local Development Plan. OP28 and OP33 together make up the Greenferns Development Framework and Masterplan area, which the Council also proposes to take forward as Aberdeen Planning Guidance in the future. These already approved Development Frameworks and Masterplans would have considered existing habitats and traffic matters.

OP20 – Craibstone South

40,154: Craibstone South is allocated in the extant Local Development Plan 2017 (CDXX) and was carried forward from the Local Development Plan 2012 (CDXX). The site was discussed in detail under Issue 15 (OP29) of the Examination of the Local Development Plan 2012 (CDXX) and Issue XX of the Examination of the extant Local Development Plan 2017 (CDXX). The principle of developing the site for residential uses has been established and it is not necessary to consider the principle of development on this site again. It is currently zoned as Land Release/Green Space Network with an opportunity for 1,000 homes and has an approved planning permission in principle for mixed use development including approximately 700 houses, a neighbourhood centre, open space provision and associated infrastructure (P140470 CDXX and CDXX). Construction is underway.

The issue of existing habitats and traffic was addressed through the planning application process for Craibstone South and can also be addressed through any future planning application processes. The Proposed Local Development Plan promotes the protection, preservation and enhancement of natural heritage, and Proposed Policy NE3 – Our Natural Heritage would apply to planning proposals, where relevant. Proposed Policy T2 – Sustainable Transport, which assesses the impact of development on the local transport network, would also apply.

OP21 – Rowett South

40, 103, 154, 531: Rowett South is allocated in the extant Local Development Plan 2017 (CDXX) and was carried forward from the Local Development Plan 2012 (CDXX). The site was discussed in detail under Issue 15 (OP30) of the Examination of the Local Development Plan 2012 (CDXX) and Issue XX of the Examination of the extant Local Development Plan 2017. The principle of developing the site for residential uses has been established and it is not necessary to consider the principle of development on this site again. It is currently zoned as Land Release/Green Space Network/Residential with an opportunity for 1,940 homes and a town centre. It already has an approved planning permission in principle for mixed use development including approximately 1700 houses, local retail and commercial provision, education, leisure and community uses, open space provision and associated infrastructure (P140844 CDXX and CDXX). Construction is underway.

Existing habitats and issues raised concerning additional traffic and school capacity were addressed through the planning application process for Rowlett South and can also be addressed through any future planning application processes. The Proposed Local Development Plan promotes the protection, preservation and enhancement of natural heritage, and Proposed Policy NE3 – Our Natural Heritage would apply to planning proposals, where relevant. Proposed Policy T2 – Sustainable Transport, which assesses the impact of development on the local transport network, would also apply.

OP22 – Greenferns Landward

154: Existing habitats and traffic matters can be further addressed through future planning application processes. The Proposed Local Development Plan promotes the protection, preservation and enhancement of natural heritage, and Proposed Policy NE3 – Our Natural Heritage would apply to planning proposals, where relevant. Proposed Policy T2 –

Sustainable Transport, which assesses the impact of development on the local transport network would also apply.

83, 717: Greenferns Landward is allocated in the extant Local Development Plan 2017 (CDXX) and was carried forward from the Local Development Plan 2012 (CDXX). The site was discussed in detail under Issue 15 (OP31) of the Examination of the Local Development Plan 2012 (CDXX) and Issues XX of the Examination of the extant Local Development Plan 2017 (CDXX). The principle of developing the site for residential uses has been established and it is not necessary to consider the principle of development on this site again. Together with OP20 and OP21, OP22 is part of the approved Newhills Development Framework (CDXX) which the Council proposes to take forward as Aberdeen Planning Guidance to support the Proposed Local Development Plan once adopted. It would therefore not be appropriate to deallocate the site. Green Belt wraps around the full length of the western and southern boundary of the site, and this has been considered in the Development Framework. This will also be considered further through the planning application process. Under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Further, the Aberdeen City and Shire Strategic Development Plan 2020 asked the Proposed Local Development Plan to focus the limited amount of housing land on brownfield sites and the constrained supply in the first instance.

OP24 – Central Park, Dyce

773, 1079, 882: Support for allocation is noted and welcomed.

63, 253, 274, 412, 540, 544, 773, 1083, 1098: In consultation with NHS Grampian, the Proposed Local Development Plan identifies new health facilities. As part of the Pre-Main Issues Report / Call For Sites) consultation, alternative sites were considered for a new health centre. These included Former Cordyce School (OP14), Stoneywood School and Bankhead Playing Fields. The former Bucksburn School (OP17) was also an option. NHS Grampian withdrew their bids for both Bankhead Playing Fields and Stoneywood School at the Main Issues Report consultation stage. The proposed Central Park location has been selected because it is more central to the community, being in close proximity to the existing medical centre and there is a cluster of facilities which enables multi-purpose trips to be made. It is proposed that the existing medical centre be turned over to open space as compensation. The issues raised regarding loss of green/open space, impact on wildlife, access, parking and overshadowing can be addressed through the planning application process. An element of open space would be expected to be included as part of any development and Proposed Policy NE2 – Open Space in New Development would apply. Proposed Policies D1 – Quality Placemaking, D2 – Amenity and T2 – Sustainable Transport would also apply.

544: A neighbour notification was served to all notifiable neighbours within a 20 metre radius of Proposed Site OP24. This included a map showing the location of the proposed allocation and explanatory text detailing the proposed use. This is the same text that is included in the Proposed Local Development Plan on page 110. The Council consider this to be appropriate as it aligns with Regulation 14 of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008 (CDXX).

OP86 – Dyce Railway Station Objections

39, 67, 79, 94, 107, 171, 174, 1079: Dyce Railway Station is allocated in the extant Local Development Plan 2017 (CDXX). The site refers to the extension of an existing car park and was discussed in detail under Issue 5 (OP86) of the Examination of the extant Local Development Plan 2017 (CDXX). Paragraph 275 in Scottish Planning Policy 2020 (CDXX) states that Development Plans are required to identify rail infrastructure and support its delivery. In accordance with this, paragraph 11.25 of the Proposed Local Development Plan sets out a Summary of Transport Intervention Options to mitigate increased transport movements resulting from the potential level of future development in the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). One of these options is additional rail station car parking at Dyce. An outcome of the NESTRANS Regional Transport Strategy 2040 (CDXX) is to develop the rail network in the Region and, as part of this, Travel Plans were undertaken for Dyce and these identified the need for additional car parking as a result of increased demand for rail growth. As per paragraph 11.27 of the Proposed Local Development Plan, the development of this additional parking will be subject to further relevant detailed appraisal and design work.

Issues in relation to loss of green space, habitat, traffic, landscape, access, and the impacts of noise, light etc. will all be considered at the planning application stage. Issues in relation to anti-social behaviour are a matter for Police Scotland, however the provision of a formal managed carpark will likely discourage the type of anti-social behaviour that could take place on the current unmanaged open space. Appendix 2 of the Proposed Local Development Plan states that Access to the Formartine Buchan Way should be retained and enhanced, and a Drainage Impact Assessment accompanying development proposals will be required to address any surface water flooding issues.

Reporter's conclusions:

Reporter's recommendations:

Issue 6	ALTERNATIVE SITES: DYCE, BUCKSBURN AND WOODSIDE	
Development plan reference:	No reference in Plan	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Marshall Farms (572) Peterkins Trustees Limited (590) Stewart Milne Homes (717) Mactaggart and Mickel Ltd (777)</p>		
Provision of the development plan to which the issue relates:	Alternative sites in Bridge of Don / Grandhome	
Planning authority's summary of the representation(s):		
<p><u>Bid Site B0109 – Newton Farm</u></p> <p>572: Object to failure to identify site for employment use. Remove Green Belt designation. Identify site for employment use in immediate term or as Strategic Reserve Land once OP23 has been delivered. Provides information on bid submission at Pre-Main Issues Report (Call For Sites) and Main Issues Report stages. Can be developed independently of larger allocations. Development will provide opportunities for smaller businesses in strategic location as required by Scottish Planning Policy. Previous allocation as GB2 in the Local Plan 1991 indicates historic acceptance of site for development. Comments on Bid Assessment pertaining to exposure, flood risk, natural conservation, built/natural elements, landscape features, landscape fit, land use mix, proximity to facilities and land use conflict. Site does not contribute to Green Belt aims – it is partly brownfield and forms an isolated parcel of land since completion of Aberdeen Western Peripheral Route. Has no agricultural value. Aberdeen Western Peripheral Route should form new Green Belt boundary. The allocation of the site for business will allow landowner to diversify business and aligns with the Aberdeen City and Shire Strategic Development Plan 2020 and Local Development Plan aims to use resources efficiently, effectively and support economic growth.</p> <p><u>Howemoss and Standingstones Farms</u></p> <p>590: No previous submissions for this site were received during the Main Issues Report (Call For Sites). Remove 26 hectare site from Green Belt and allocate for Business and Industry in the Proposed Local Development Plan. Site is a logical expansion of Kirkhill industrial Estate. Green Belt zoning no longer appropriate. Aberdeen Western Peripheral Route forms logical boundary for Green Belt. Land is not prime agricultural land. Possible access and connections to utility services. Core Path will be safeguarded. Pipeline Notification Zones do not preclude site from development. Site allocation will meet demand in airport location. Already have an interested company. Allocation of site can replace loss of employment land at OP2 - Cloverhill.</p>		

Bid Site B0102 - Newhills South

717: Allocation will help meet the Aberdeen City and Shire Strategic Development Plan 2020 housing land requirements. Benefits from proximity to Masterplan site for primary school and mixed use area accessible to public transport. Infill site. Site must be viewed in the context of surrounding urban expansion. Removal of site from Green Belt will not be detrimental to landscape setting. Site is a good area for growth. Bid assessment did not consider proximity of Newhills development. Green Space Network of Newhills Development Framework will provide recreation opportunities and community access. Site is under the control of a housebuilder and has no constraints.

Bid Site B0108 - Newton Croft, Bucksburn

777: Objects to failure to identify site. Requests land is allocated for the development of up to 80 houses. Includes supporting documents.

Modifications sought by those submitting representations:

Bid Site B0109 - Newton Farm

572: Remove Green Belt designation and identify land as opportunity site for employment use either in the immediate term or as Strategic Reserve Land. Amend Table 4: Employment Land Allocations and Strategic Reserve Employment Land to reflect inclusion of site.

Howemoss and Standingstones Farms

590: Include site in the Proposed Local Development Plan as an Opportunity Site for Business and Industrial use.

Bid Site B0102 - Newhills South

717: Zone site as residential development for 100 homes as part of OP21: Rowett South.

Summary of responses (including reasons) by planning authority:

Employment Sites General

A number of employment sites identified in the Proposed Local Development Plan have been carried over from the extant Local Development Plan 2017 (CDXX) which went through a similar site assessment process at that time. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) sets the requirements for employment land allowances and these are set out in Table 4 and Table 5 of the Strategic Development Plan 2020, and within table 4 of the Proposed Local Development Plan's the Spatial Strategy. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) requires the Proposed Local Development Plan to maintain a ready supply of at least 60 hectares of marketable employment land in suitable locations. In addition, at least 20 hectares of this marketable land should be of a standard which will attract high quality businesses. The Proposed Local Development Plan has allocated 105 hectares of employment land up to 2032 and has an additional 70 hectares of Strategic Reserve land.

Bid Site B0109 - Newton Farm

In preparing the Proposed Local Development Plan a Development Options Assessment (CDXX), Strategic Environmental Assessment (CDXX), and Main Issues Report (CDXX) were used to identify the most suitable locations to deliver the required growth. The site in question is situated in close proximity to existing employment land at Kirkhill Industrial Estate and Dyce Drive. In addition, there are still significant parts of Dyce Drive employment area that remain undeveloped. There is therefore no need to identify further land in this particular location. Given the extent of available employment land in the city as evidenced by the Employment Land Audit 2018 (CD XX), the existing Green Belt zoning of the site is considered to be appropriate.

Howemoss and Standingstones Farms

The Council does not support allocating the new site Howemoss and Standingstones Farms for employment use. The site was not put forward as a development bid so was not considered as such at the Main Issues Report stage, nor was it subject to site assessment or public consultation. In addition, as demonstrated in Issue 1: Vision, Spatial Strategy and Policy LR1 – Land Release there is an appropriate and sufficient supply of deliverable employment sites within Aberdeen City. There is therefore no need to identify further employment land.

Housing Sites General

In preparing the Proposed Local Development Plan a Development Options Assessment (CDXX), Strategic Environmental Assessment (CDXX), and Main Issues Report (CDXX) were used to identify the most suitable locations to deliver the required growth. A number of greenfield sites identified in the Proposed Local Development Plan have been carried over from the extant Local Development Plan 2017 (CDXX) which went through a similar site assessment process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Proposed Local Development Plan Delivery Programme (CDXX). The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) sets the requirements for greenfield housing and employment land allowances and these are set out in Table 3 and Table 4 of the Aberdeen City and Shire Strategic Development Plan 2020, and is reflected within the Proposed Local Development Plan's Spatial Strategy. Paragraph 4.18 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states, "*new allocations should consider opportunities to reuse brownfield land and attempt to utilise the current "constrained" supply in the first instance. However, it is likely that some new development will need to take place on greenfield sites in order to help deliver the Vision and future strategy for growth. Allocations should be of a scale which would not inhibit the delivery of current strategic allocations and should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise*". There is a requirement for at least 40% of all new housing in Aberdeen City to be on brownfield sites. Under Issue 2: Housing Land Supply we conclude that the Strategic Development Plan's greenfield requirements have been fully met and we are confident that a continuous five year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan.

Bid Site B0102 - Newhills South

This site is covered in trees and part of it is classed as Ancient Woodland. The Council accepts that a significant proportion of this is plantation forestry. Nevertheless, development would result in the loss of a significant number of trees. Whilst it is understood that new facilities may be provided in future as part of the wider Newhills development, allocation of this site would not be appropriate because it has not been subject to the same masterplanning exercise as the existing strategic development sites. Because of this, the site is considered to be undesirable for development.

Bid Site B0108 - Newton Croft, Bucksburn

This site was assessed as part of the Examination into the extant Local Development Plan 2017 (Issue XX – CDXX) and Reporters concluded that it contributes positively to Green Belt objectives separating the site from Auchmill Golf Course. It is felt that the site still contributes to the landscape setting of Aberdeen and its development is not supported. Whilst Officers favoured allocating the site in the Proposed Local Development Plan 2010 (CDXX), it was removed by Reporters at the Examination of this Plan (Issue XX - CDXX), it should be borne in mind that the context was very different at that time with the requirement to identify 36,000 houses from the Aberdeen City and Shire Structure Plan 2009 (CDXX). The housing allocations required for this Proposed Local Development Plan are much lower and it does not warrant allocation of this site at this time.

Reporter's conclusions:

Reporter's recommendations:

Issue 7	ALLOCATED SITES AND GENERAL AREA STRATEGY: KINGSWELLS AND GREENFERNS	
Development plan reference:	Pages 23, 32 - 33, 36 - 37, Appendix 2, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p> Susan Robertson (34) Susan and Davina Robertson (55) Sharon Leslie (65) Andrea Rae (66) Laura Robison (74) Duncan McNeill (78) Eveline Robertson (121) Teresa McAllister (138) Pauline Dix (139) Pauline O'Sullivan (140) Janette Thompson (141) Mandy Lawson (142) Celeb Wake (144) Naomi Lind (145) Lee Clark (147) Susan Plenderleith (148) Phil Groundwater (154) Keith Low (155) Evan William Alexander (156) Lynne Moir (158) Mrs Carol Gerrard (168) Rose Clayton MBE (170) Scott O'Neill (180) Christine Tarvet (196) A.R. Williamson (224) Elaine Sutherland (227) Ron J Bird (267) Leila Donald (357) James Dick (380) Kenny Philip (384) Jennifer Morrison (467) Martin Morrison (468) Nina Ashby (496) Kiara Gerrard (581) Carrie Gardner (584) Arlene Morrison (615) Yvonne Joss (617) Laura McWilliam (664) Westhill and Elrick Community Council (686) Linda Cleary (689) Stewart Milne Homes (717) Donald and Oonagh Grassie (731) Cameron and Catherine Bowden and Smith (795) </p>		

Jo Masson (810)
Aberdeen Football Club Plc (944)
Louise McCafferty (1095)
Nicola Lomax (1100)
Simon Harkins of SGN (1101)

Provision of the development plan to which the issue relates:

Opportunity Sites in Kingswells and Greenferns

Planning authority's summary of the representation(s):

General Area Strategy for Kingswells/Greenferns

154, 155, 170, 686: There are not enough shops or schools in the area to support further housing being developed. Development will reduce green spaces and impact on wildlife. Existing road infrastructure is already congested. Concerns regarding the increase on traffic volume along the A944 post the Aberdeen Western Peripheral Route completion, and the cumulative impact of approved planning applications along the road. Concerns the development industry is viewing the A944 as a development corridor, which will lead to coalescence. The Green Belt between Kingswells and Westhill needs to be protected.

OP26 - Old Skene Road

74: Considers an additional 14 homes at OP26 would have an impact on the amenity value of the surrounding area due to the resulting traffic and visual impact of development. Kingswells Primary School has capacity issues and could not accommodate additional students.

384, 795: The development will remove the last area of open space on Old Skene Road. The area has become crowded with cumulative housing development. The site offers recreational opportunities. There are protected species and other fauna on the site which will be lost. Development on the site would disrupt views from and restrict light to dwellings. There is no requirement for housing and there are other areas being developed that shouldn't require the loss of a greenfield site for 14 houses.

615: Highlights (in their opinion) the unsuitability of this land for residential development. Concerns about safety of access - the land borders a dual carriageway on one side and a pedestrian/cycle path on the other. Vehicles should not cross a cycle path to enter or exit a housing development. Concerns about topography, the level of the land is much higher, and this will result in a detrimental effect on the properties which it looks down on (specifically Chivas Mhor). Light to Chivas Mhor will be severely affected. This is a dead end, not a main road. Difficult to justify additional traffic journeys being safe given the number of people using the pedestrian/cycle path.

1101: SGN notes the United Kingdom Government's statements regarding climate change and has reviewed the Proposed Aberdeen Local Development Plan and Delivery Programme to identify areas of concern for their network. Sites that would connect to the supply from the north have the potential to trigger a main lay reinforcement on the Intermediate Pressure network. This site has either commenced or could start construction prior to 2025 and this development could trigger the requirement for reinforcement. Reinforcement of the existing Low Pressure (LP) network may be necessary to support

development on this scale, dependent on the final point of connection to SGN's network. Only when a connection request has been made to SGN will we know if reinforcement is required on the LP. SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a 'first come, first served basis'.

731: Objects to the site being included for development. The site lies in the Green Belt and much Green Belt has been lost to housing development over the last 30 years. This is prime agricultural land used for grazing and crops. Respondent maintains that the green space between Kingswells and the rest of the City should be retained, maintain this 'green wedge.' The indicative site plan pays little regard to the existing cycle and path route. This is a Core Path, a prime asset and a well-used thoroughfare. There are issues with the drainage system shown on the maps in the plan.

OP27 - Greenfern Infant School

1101: SGN notes the United Kingdom Government's statements regarding climate change and has reviewed the Proposed Local Development Plan and Delivery Programme to identify areas of concern for their network. Sites that would connect to the supply from the north have the potential to trigger a main lay reinforcement on the Intermediate Pressure network. This site has either commenced or could start construction prior to 2025 and this development could trigger the requirement for reinforcement. Reinforcement of the existing Low Pressure (LP) network may be necessary to support development on this scale, dependent on the final point of connection to SGN's network. Only when a connection request has been made to SGN will we know if reinforcement is required on the LP. SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a 'first come, first served basis'.

OP28 - Greenferns and OP33 - Greenferns

34, 55, 65, 66, 121, 138, 139, 140, 141, 142, 144, 145, 147, 148, 154, 156, 168, 180, 196, 224, 227, 267, 357, 380, 467, 468, 581, 584, 617, 664: Objects to OP28 Greenferns and OP33 Greenferns. Believes that the development will result in a loss of green space which will have a negative impact on the community and individuals mental health/wellbeing as it is widely used for recreation. Concerns over loss of habitat, including ancient trees which will impact wildlife and in particular the development may have an impact on the numerous bats observed at the site. Impacts on surrounding landscape also noted. Development will lead to increased levels of traffic and put extra pressure on local infrastructure such as schools, local shops etc. Already too much development in the area, some of which is vacant. Brownfield should be developed over these sites. Concerns regarding anti-social behaviour at Gypsy / Traveller site noted. The units will not be affordable for people. Should ensure there are accessible paths.

158: Object to development of OP28 Greenferns and OP33 Greenferns as it would increase footfall.

581: Comments submitted about detail of proposed development site. Large green buffer between existing settlement and new development. Keep the historical boundary stones (March Stones) or development around them. Should have an organic housing design, and retain Howes Road as it is used for recreation. Protect the woodland and breeding birds.

689: Respondent references Greenferns but does not make any other comments.

717: OP28 Greenferns has been identified since the Finalised Local Plan in 2004. Concerns were raised by the development industry at the Local Plan Inquiry in 2006 regarding the delivery of the site. There is no planning consent for the site, and the site is constrained within the Aberdeen and Shire Housing Land Audit 2019 and the Draft Aberdeen City and Shire Housing Land Audit 2020. Scottish Planning Policy paragraph 119 notes there should be confidence land will be brought forward within the Plan period. There is no confidence this will happen as the site has been undelivered since 2004 and the Delivery Programme give no guidance on how the site will be delivered. It should be replaced with a deliverable site.

1095: Concerned about scale of proposal and loss of green space. Concerned about potential flood risk. The development would need comprehensive sustainable urban drainage systems to cope. Concerned about negative impact on wildlife/natural heritage. Concerned housing proposed won't be affordable to local people. Would like to see family Council homes built instead of private homes. An environmental assessment is needed, as well as an assessment of the type of housing the area needs. Full consultation with local people is required. A flood risk assessment is required.

1100: Concerned about drainage and flooding on Howes Road and Bucksburn Burn. Concerned about loss of natural habitat. Concerned about increase in roads/traffic and how the Council will manage to maintain additional roads. Design of houses should be in keeping with area. Concerned about oversupply of new housing resulting in empty properties. Concerned about social issues in the area. Content for new health centre for site.

1101: SGN notes the United Kingdom Government's statements regarding climate change and has reviewed the Proposed Aberdeen Local Development Plan and Delivery Programme to identify areas of concern for their network. Sites that would connect to the supply from the north have the potential to trigger a main lay reinforcement on the Intermediate Pressure network. This site has either commenced or could start construction prior to 2025 and this development could trigger the requirement for reinforcement. Reinforcement of the existing Low Pressure (LP) network may be necessary to support development on this scale, dependent on the final point of connection to SGN's network. Only when a connection request has been made to SGN will we know if reinforcement is required on the LP. SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a 'first come, first served basis'.

OP29 - Prime Four Business Park

810: Objects to further development. Comments raised regarding the value of green space, given the recent pandemic. Comments raised regarding the previous development of the Green Belt - areas such as this are a support to local communities. Increasing development results in the loss of community/neighbourhood feel.

OP30 - Kingsford

944: Support the allocation of the site.

OP31 - Maidencraig South East and OP32 - Maidencraig North East

78, 496: Does not support allocations OP31 and OP32 as they encircle the Den of Maidencraig and the result is a narrow fragmented corridor of habitat which is cut off from surrounding habitat. Concern over loss of open space and trees.

OP34 - East Arnall and Carnie Woods

686, 689: Suggests tree planting on the site and take the opportunity to increase accessibility of the woodland and repurpose some land for other recreational uses.

OP63 - Prime Four Business Park Phase 5 Extension

810: Objects to further development. Comments raised regarding the value of green space, given the recent pandemic. Comments raised regarding the previous development of the Green Belt - areas such as this are a support to local communities. Increasing development results in the loss of community/neighbourhood feel.

1101: SGN notes the United Kingdom Government's statements regarding climate change and has reviewed the Proposed Aberdeen Local Development Plan and Delivery Programme to identify areas of concern for their network. Sites that would connect to the supply from the north have the potential to trigger a main lay reinforcement on the Intermediate Pressure network. This site has either commenced or could start construction prior to 2025 and this development could trigger the requirement for reinforcement. Reinforcement of the existing Low Pressure (LP) network may be necessary to support development on this scale, dependent on the final point of connection to SGN's network. Only when a connection request has been made to SGN will we know if reinforcement is required on the LP. SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a 'first come, first served basis'.

OP111 - Skene Road, Maidencraig

78: Does not support allocation OP111 as it encircles the Den of Maidencraig and the result is a narrow fragmented corridor of habitat which is cut off from surrounding habitat.

Modifications sought by those submitting representations:

General Area Strategy for Kingsells/Greenferns

170: Rethink additional housing around Mastrick, Northfield, Sheddocksley and Bucksburn.

OP26 - Old Skene Road

74, 384, 615, 731: Do not develop the area and leave the site as it is.

OP28 - Greenferns and OP33 - Greenferns

55, 121, 139, 140, 141, 144, 154, 156, 168, 180, 196, 224, 227, 357, 380, 617: Remove OP28 and OP33 from the Proposed Local Development Plan.

65: Allocate more nature reserves rather than allocate more houses.

138: Find an alternative site which is not green space and habitat.

584: Remove OP28 allocation from the Proposed Aberdeen Local Development Plan.

717: Remove OP28 from the Proposed Local Development Plan and insert an alternative site for residential development – for example Gillahill, Huxterstone, Contlaw, Newton of Mundurno or Mundurno.

1095, 581: Reduce size of OP28 and OP33.

1100: No residential development on OP33.

OP31 - Maidencraig South East and OP32 - Maidencraig North East

496: Restoration in place of new development. Encourage more allotments, plant more woods and develop more green corridors for recreational use.

78: Remove OP31 and 32 from the Proposed Local Development Plan.

OP111 - Skene Road, Maidencraig

78: Remove OP111 from the Proposed Local Development Plan.

Summary of responses (including reasons) by planning authority:

General Area Strategy for Kingswells/Greenferns

154, 155, 170, 686: In the Kingswells/Greenferns area the Proposed Local Development Plan on the whole carries over Opportunity Sites (OP sites) that are identified for development in the extant Local Development Plan 2017 (CDXX). The proposal at OP26 Old Skene Road is for a small scale residential development of 14 houses and OP30 Kingsford, which is proposed for a stadium and training facilities, are newly identified in this Proposed Local Development Plan. All other allocations were identified in the extant Local Development Plan 2017 (CDXX) following favourable consideration at either the last Examination through Issue 7 (CDXX) or the Examination into the Local Development Plan 2012 through Issues 19, 29, 30, 31 and 32 (CDXX). The principle of development in this area is therefore long established and it remains appropriate to retain these development opportunities as there has been no significant change in circumstances to justify an amendment to the allocations. Between the urban edge of Aberdeen City and Kingswells there is a significant area of Green Belt and Green Space Network which are both covered by protective zonings. Specifically, at Prime Four and Maidencraig these sites are subject to approved Development Frameworks/Masterplans (CDXX and CDXX) and both are at advanced stages of construction/occupation. Greenferns (OP28 and OP33) has a Draft Development Framework (CDXX) that is currently published as Interim Planning Advice. The intention is for these documents to be taken forward as Aberdeen Planning Guidance where they will be material in determining any future planning proposals.

For new sites a Development Options Assessment (CDXX) was carried out which allowed development proposals and 'bid sites' to be assessed in order to identify the most suitable

areas for development. A range of criteria were used to assess sites, including environmental issues such as habitats, protected species, nature conservation and landscape features.

Nevertheless, it is recognised that any new site is likely to have some negative impacts associated with its development. Because of this, a Strategic Environmental Assessment (SEA) has also been carried out and the outcome of this was used, alongside the Development Options Assessment, to come to a decision on which sites were suitable for development. The findings of the SEA are included within an Environmental Report (CDXX_), which was published alongside the Proposed Local Development Plan. The Strategic Environmental Assessment on its own does not tell us whether a site is suitable for development or not. The assessments do however provide a wealth of information which allows us to reach a view on each site. The assessments can also help to highlight possible mitigation measures which could be carried out on particular sites in order to make what might be an otherwise might be considered unsuitable development acceptable.

In these ways, environmental and cumulative issues were taken into account in making the allocations. And where negative impacts were identified, the Environmental Report (CDXX) highlights mitigation to reduce the impacts.

OP26 - Old Skene Road

74, 384, 615, 731, 795: This site came in as Bid Site B0320 at the initial Call for Sites stage of this Proposed Local Development Plan process. The Aberdeen City and Shire Strategic Development Plan 2020 page 31 (CDXX) requires Aberdeen City to prioritise brownfield sites. In addition to this, any greenfield housing allocations should be small scale, have limited impacts on the environment and infrastructure and should not be extensions to existing sites identified in the extant Local Development Plan 2017 (CDXXX (SDP) pages XX). On that basis the site at Old Skene Road was identified as a 'preferred' housing allocation and has been taken forward as OP26 - Old Skene Road. It has been assessed as part of the Development Options Assessment Report (CDXX). The site is well sheltered, has good drainage and no flood risks. Development on the site would result in little loss of natural environment/heritage or built/cultural heritage. The site is part of the Green Belt and contributes to maintaining the open setting between Kingswells and Aberdeen, however, it is well-connected to the Kingswells settlement and the scale of the development proposed would not encroach significantly into the open countryside. Although Kingswells Primary School is almost at capacity, development of OP26 - Old Skene Road would not pose a significant constraint given the small-scale nature of the development. The issues raised regarding impact on local amenity, loss of daylight/overshadowing, impact on wildlife, road safety concerns, drainage and increased traffic can be addressed through the planning application process.

1101: These comments are noted and any potential issues regarding connection to the gas network will be dealt with through the planning application process.

OP27 - Greenfern Infant School

1101: These comments are noted and any potential issues regarding connection to the gas network will be dealt with through the planning application process.

OP28 - Greenferns and OP33 - Greenferns

34, 55, 65, 66, 121, 138, 139, 140, 141, 142, 144, 145, 147, 148, 154, 156, 158, 168, 180, 196, 224, 227, 267, 357, 380, 467, 468, 581, 584, 617, 664, 717, 1095, 1100: OP28 Greenferns has been allocated in the extant Local Development Plan 2017 (CDXX), the Local Development Plan 2012 (CDXX) and the Local Plan 2008 (CDXX). The site itself was discussed in detail under Issue 19 (OP39) of the Report of Examination of the extant Local Development Plan 2012 and the Gypsy Traveller policy and site requirements were discussed under Issue 111 (CDXX). The principle of developing the site for residential uses (including a Gypsy Traveller site) has been long established and it is not necessary to consider the principle of development on this site again. As discussed above under the Council's response 'General Area Strategy Kingswells and Greenferns' there is an approved Development Framework covering both OP28 and OP33 (CDXX). It would therefore not be appropriate to deallocate the site. The detailed concerns raised by respondents regarding protection of habitats and trees, traffic, local infrastructure, paths, historical elements, sustainable urban drainage systems, affordable housing contributions and design can all be dealt with through a future planning application process. Under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020(CDXX) greenfield requirements have been fully met and we are confident that a continuous five- year effective Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Further, the Strategic Development Plan 2020 requires (at paragraph XX) the Proposed Local Development Plan to focus the limited amount of housing land on brownfield sites and constrained supply in the first instance.

689: Comments noted.

OP29 - Prime Four Business Park

810: OP29 Prime Four Business Park has been allocated in the extant Local Development Plan 2017 (CDXX) and the Local Development Plan 2012 (CDXX). The site was considered in detail under Issue 31 (OP40) of the Report into the Examination of the Local Development Plan 2012 (CDXX). The principle of developing the site for employment uses has been long established and it is not necessary to consider the principle of development on this site again. As discussed above under the Council's response 'General Area Strategy Kingswells and Greenferns' there is an approved Development Framework and Phase 1 Masterplan (CDXX) and Phase 2 and 3 Masterplan (CDXX) for OP29. The site is at an advanced stage and predominantly now occupied.

OP30 - Kingsford

944: Support for OP30 Kingsford is noted and welcomed.

OP31 - Maidenraig South East and OP32 - Maidenraig North East

78, 496: Both Maidenraig sites have been allocated in the extant Local Development Plan 2017 (CDXX) and the Local Development Plan 2012 (CDXX). They are discussed in detail under Issue 29 (OP43 and OP44) of the Report into the Examination of the Local Development Plan 2012(CDXX). The principle of developing these sites for residential uses has been long established and it is not necessary to consider the principle of development on them again. As discussed above under the Council's response 'General Area Strategy Kingswells and Greenferns' there is an approved Masterplan covering both

OP31 and OP32 (CDXX). These sites are at an advanced stage in terms of planning and construction with many homes being occupied.

OP34 - East Arnall and Carnie Woods

686, 689: OP34 East Arnall is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried over into the Proposed Local Development Plan. OP34 - East Arnall borders both Aberdeen City Council and Aberdeenshire Local Authority boundaries. This is taken into account in the 'Other Factors' column of Appendix 2, which states "*An opportunity for development of 1 hectares of employment land. A masterplan with Aberdeenshire Council involvement would be desirable given that the site borders the Local Authority boundaries.*" The respondent's suggestion that tree planting and improved accessibility to nearby Carnie Woods should be considered as part of the development is noted. These issues will be dealt with through the required Masterplanning process and future planning application process.

OP63 - Prime Four Business Park Phase 5 Extension

810: OP63 - Prime Four Business Park Phase 5 Extension is allocated in the extant Local Development Plan 2017 (CDXX). The site was discussed in detail under Issue 7 (OP63) of the Report into the Examination of the extant Local Development Plan 2017 (CDXX). The principle of developing the site for employment uses has been long established and it is not necessary to consider the principle of development on this site again. The Reporter concluded at the time that despite impact on green space and Green Belt status that, "*given the economic success and quality of the existing Prime Four Business Park, I consider it likely that development would deliver a significant economic benefit. Scottish Planning Policy requires me to give due weight to the economic benefit of development, and for this reason, on balance, I conclude that the allocation should be maintained.*" As discussed above under the Council's response 'General Area Strategy Kingswells and Greenferns' there is an approved Development Framework covering OP63 (CDXX).

1101: These comments are noted and any potential issues regarding connection to the gas network will be dealt with through the planning application process.

OP111 - Skene Road, Maidencraig

78: OP111 - Skene Road is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried over into the Proposed Local Development Plan. Within the 'Other Factors' column of Appendix 2, it states, "*A flood risk assessment will be required to accompany any future development proposals for this site. Development should seek to avoid any adverse impacts on the Den of Maidencraig Local Nature Conservation Site . A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee Special Area of Conservation. As part of this process it is likely a Construction Environmental Management Plan will also be required.*" The respondent's comments regarding fragmentation of habitat corridors are noted and the Council agree that it will be very important that these matters are given careful consideration at the planning application stage. The required Environmental Assessments noted in Appendix 2 for this site will help to ensure that these matters are given due consideration.

Reporter's conclusions:

Reporter's recommendations:

Issue 8	ALTERNATIVE SITES: KINGSWELLS AND GREENFERNS	
Development plan reference:	No reference in Plan	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>CAF Properties (497) LAR Housing Trust (571) G&P Simpson (605) Shell UK Limited (730) Stewart Milne Homes (753) ANM Group Ltd (786) Jo Masson (810) Cults, Bieldside and Milltimber Community Council (833) Drum Property Group (859) Bancon Homes (862) Stewart Milne Homes (886) CALA Homes (North) Ltd (900) Aberdeen Football Club Plc (944)</p>		
Provision of the development plan to which the issue relates:	Alternative sites in Kingswells and Greenferns	
Planning authority's summary of the representation(s):		
<p><u>OP29 - Prime Four Kingswells</u></p> <p>497: Amend OP29 to reflect both the existing Business Zone allocation and the planning consent granted for Class 3 (Food and drink) development including drive-thru facilities as per Bid Site B0307. The Council's approval of planning application reference 181336/DPP demonstrates that it considers Class 3 use of this site to be appropriate, whilst the existing Business Zone allocation clearly demonstrates that it is also suitable for office and other Class 4 uses.</p> <p>859: Modification sought to allow for a greater mix of uses within the site. Prime Four has been a successful business park for the City but the office market has altered considerably and a more flexible approach will be needed to support a successful transition towards Energy Transition. New clean industrial uses or research and development facilities may be required. New mixed-use business areas that provide a high quality working amenity to support inward investment from new clean energy businesses will also be required. Prime Four is constrained by the existing and proposed land use zoning. Proposed changes to site description will support a more flexible approach.</p>		

OP30 - Kingsford

944: Remove site from Green Belt allocation to reflect the planning consent reference 170021/DPP. Consent has been implemented. Green Belt review is required. As the site has been granted planning permission it no longer meets the criteria for Green Belt. The Green Belt allocation is restrictive, and will not allow flexibility within the ongoing project, and could limit the economic and community benefits.

OP63 - Prime Four Extension

859: Modification sought to allow for a greater mix of uses within the site. Prime Four has been a successful business park for the City but the office market has altered considerably and a more flexible approach will be needed to support a successful transition towards Energy Transition. New clean industrial uses or research and development facilities may be required. New mixed-use business areas that provide a high quality working amenity to support inward investment from new clean energy businesses will also be required. Prime Four is constrained by the existing and proposed land use zoning. Proposed changes to site description will support a more flexible approach.

Bid Site B0302 - Gillahill, Kingswells

753: Objects to the failure to identify Bid Site B0302 Gillahill, Kingswells for residential development. Site is suitable for mix of uses, including up to 650 homes, a replacement primary school, civic space and café. Site would be a natural and sustainable extensions to Kingswells. Site has historically been earmarked for development in previous Local Plans. Site is deliverable with no issues that cannot be overcome. Development of the site will not compromise the Green Belt aims to avoid coalescence and protect landscape setting. Bid proposes a range and mix of uses. Requests that the site is removed from Green Belt and identified as an Opportunity Site for residential development, a primary school and civic space. Failing this, request the site is identified as Strategic Reserve Land.

Bid Site B0303 - Land at Sunnyfield, Kingswells

571: The Proposed Local Development Plan should be amended to reflect willingness to approve planning permission in principle for erection of residential development comprising 23 affordable dwellinghouses at Sunnyfield, Old Lang Stracht, Kingswells (application reference 190134/PPP) as agreed by the Planning Development Management Committee on 23 January 2020. Site to which application relates is that covered by Bid reference B0303. The Council's willingness to approve demonstrates its settled view as to the appropriateness of affordable housing development on the site of indicatively 23 units. To provide confidence to landowner, developer and community that the proposal can be delivered it is essential that the Proposed Local Development Plan reflect the Council's decision and that the site be allocated accordingly and per Circular 6/2013. Delivery of affordable housing is strongly advocated in the Proposed Local Development Plan and allocates sites for specific affordable housing allocations. However, paragraph 9.12 makes clear that additional affordable housing would be required. Thus allocating this site would be consistent with aspirations for the Proposed Local Development Plan and the approach to allocate specific affordable housing sites. Respondent summarises previous submissions to Call For Sites and Main Issues Report consultation stages - copies of which are provided. In summary: Site is south facing, with good drainage and no risk of

flooding; Development would result in little or no loss of nature conservation or built/cultural heritage elements; Site is well connecting to existing settlement with core path nearby; Site is low lying, sheltered and with scope for structured landscape belts; Average gradient across site is 1:11 presenting no issue for developing; Affordable housing use is much needed on a site well located for access to services and facilities; Stone dykes are a recognised landscape feature to be retained; Development at the location would be no more prominent than existing developments in the area and would appear as a natural extension to existing settlement; Sufficient education capacity available. Notes that other sites in the area (B0320) were assessed as desirable yet scored lower in the assessment criteria.

Bid Site B0305 - Gateside Farm

605: Objects to the failure to identify Bid Site B0305 for residential development. With reference to previous submissions made to the Main Issues Report it is particularly submitted that the site is not conspicuous in the wider landscape nor an essential element of the Green Space Network or that development at the site would be contrary to the Aberdeen City and Shire Strategic Development Plan 2020. Comments are provided with regards to incorrect site scoring and assessment of the site with regards to orientation, drainage, visibility, noise nuisance. Essential part of Green Space Network - it is not sustainable to suggest the whole site is essential to buffer Aberdeen to Kingswells. Part of the site has already been allocated as part of Maidencraig, there is existing housing to south east and a further land allocation at OP111 has been made. It is contended that the Bid Site is a small remaining corner of a large area where sustainable mixed use development has been deemed acceptable. The only part of the site which could be described as essential is the area adjoining the Denburn which it is proposed to retain and landscape as a wildlife corridor. Notes sites OP31 and OP111 have been identified on the City Wide Proposals Map to extend up to the centre of the river. Notes OP31 proposed a variety of uses (health centre and commercial space) and existing uses include retail and gym. The site is not remote from facilities and this is further supported by the provision of a Core Path adjoining the site. Compliance with Aberdeen City and Shire Strategic Development Plan 2020 - Site should not be excluded by suggesting the site forms an extension to existing development sites. The Aberdeen City and Shire Strategic Development Plan 2020 does not presume against extension to all masterplanned sites and advocates that allocations are small in nature and that Local Plans deliver a range of sites in accordance with Scottish Planning Policy paragraph 119. The site is not in the same ownership as Maidencraig (OP31) masterplanned area although adjacent. It is a separate development, does not depend on OP31 for access or servicing, can be delivered early, and is a logical use for the sole remaining part of a field which has already been partially zoned for such use. Further details on the case for development are set out including the viability and economics for the land to be continued in farm use and risk of the land becoming neglected and derelict.

Bid Site B0309 - Derbeth Kingswells

730: Support undesirable status and decision not to allocate in the Proposed Local Development Plan.

810: Objects to further development north west of Kingswells. Comments raised regarding the value of green space, given the recent pandemic. Comments raised regarding the

previous housing development of the Green Belt and resulting increasing traffic levels. Areas such as this are a support to local communities. Increasing development results in the loss of community/neighbourhood feel. Suggests that more should be done to revitalise city and town centres, leading to economic improvements and the environment. Comments raised regarding the potential for Union Street to become a vibrant and busy centre if more of a focus were placed on it. Specific example given of British Home Store being vacant and the redevelopment of it. Redevelop existing vacant buildings and facilities for flats and shops to make the city centre a place where people would want to live and work and play setting precedent to reclaim, redevelop and recycle existing.

900: Land at Derbeth (as set out supporting document DER1) should be allocated for both development in the period 2020 to 2032 but also as strategic reserve for 700 residential units, associated uses including a primary school. The allocation of the Derbeth site in the Proposed Local Development Plan would address an imbalance of the Spatial Strategy and strengthen the Proposed Local Development Plan's effective supply. It is deliverable in the short term and will support the delivery of the Aberdeen City and Shire Strategic Development Plan 2020's Spatial Strategy. It is considered that the housing allowances are not fully achieved and the site is ideally located deliver the objectives of the Spatial Strategy, it is in proximity to existing infrastructure and active employment sites and would make positive contribution towards the modal shift to sustainable travel. Kingswells has very limited land allocated for development and is a popular location so allocating the Bid Site would ensure an effective supply of housing for this Plan period and beyond. Delivering the site will improve local benefits to connectivity which the Aberdeen Western Peripheral Route had severed. Proposed phasing is for 380 units to 2032 with additional units contributing towards future housing allowances set out by the Aberdeen City and Shire Strategic Development Plan 2020. A phased approach is sustainable and provides for long term benefits. No review of the Green Belt has taken place since the Local Development Plan 2012 and it is considered that a review is required given the changes around the western edge of Kingswells namely the completion of the Aberdeen Western Peripheral Route. There is insufficient allowance for expansion of Kingswells and the Bid Site does little to contribute towards the character or landscape setting of the City. The Aberdeen Western Peripheral Route provides a clear visual boundary to redefine the edge of development and surrounding countryside. There are minimal planning constraints that can be overcome, there is no risk of flooding, the site is freely draining, provision of a new primary school is promoted to address education capacity requirements, affordable housing will be provided. Further supporting documents DER1, DER2, DER3, DER4, DER5 and DER6 are enclosed with representation.

Bid Site B0310 - Prime West

730: Support undesirable status and decision not to allocate in the Proposed Local Development Plan.

Bid Site B0311 - Prime Four North

859: Bid Site B0311 is a logical location to allocate housing to meet the needs of Kingswells and reflect changing nature of the land post Aberdeen Western Peripheral Route. The site has no constraints, is deliverable and is of a scale that requires limited infrastructure upgrades in order to enable development early in the plan period. It will have minimal landscape impact, does not meet functions of the Green Belt per Scottish

Planning Policy, less impact on the Consumption Dyke than the allocated Prime Four business park and is highly accessible with opportunities to improve pedestrian links to Kingswells and Prime Four. The site will provide public open space and a safe route to school. Accessible employment and leisure is nearby at Prime Four Business Park. The site has historically been identified as a future housing development area in the Finalised Local Plan 2004.

Bid Site B0312 - East Kingsford and Industrial Park Area

730: Support undesirable status and decision not to allocate in the Proposed Local Development Plan.

859: Bid Site B0312 is located at an Aberdeen Western Peripheral Route junction and offers clear opportunity for modern refuelling services including food and drink. There are no refuelling options serving the Aberdeen Western Peripheral Route. It is easily accessible and, as the existing 5-Mile garage adjacent to Prime Four may form part of future development, the allocation of B0312 will allow for relocation of filling station services. Land at Ardene Veterinary Practice (east of site on A944) was recently approved for food and drink uses (181336/DPP). The proposed use would have minimal impact on the road network. Due to the impact of the Aberdeen Western Peripheral Route the proposed development provides a use for brownfield land in an industrial setting that is now surrounded by major new roads infrastructure and sporting facilities. The previous use has been rendered unviable due to proximity to Aberdeen Western Peripheral Route. The site is zoned as Green Belt but is brownfield land with existing use rights as part of the East Kingsford industrial complex and previous uses. The site no longer sits in countryside but is now a small industrial area set within an urbanised landscape. The Green Belt zoning is no longer appropriate, and the site should be rezoned. Rezoning from Green Belt to the proposed use will create opportunity for small scale commercial development to serve passing traffic from the Aberdeen Western Peripheral Route and A944.

859: Request rezone of Kingsford Industrial Park area to Business and Industry.

Bid Site B0314 - Maidenraig North West 1 and Bid Site B0315 - Maidenraig North West 2

862: Site extends to 12.1 hectares and was promoted for two alternative schemes with mixed uses at B0314 (100 homes and 5,000 square metres of employment and up to 2,000 square metres of retail) or solely housing at B0315 (200 homes). Site should be allocated as it can be developed as an extension to a strategic location, can address shortfall of effective land supply, is effective, would contribute new homes in an area with proven demand in a logical extension to existing allocation to be delivered within the Plan period. Site was previously supported at Local Plan inquiry in 2008. Development can be accommodated without risk of significant visual impact up to 145 metre contour line or risk of coalescence with Kingswells. Development has occurred adjacent at Dobbies Garden Centre.

Bid Site B0316 - Smiddybrae

730: Support undesirable status and decision not to allocate in the Proposed Local Development Plan.

Bid Site B0926 - Huxterstone

786: Requests that the land identified as B0926 - Huxterstone is identified as a healthcare and employment land allocation. Bid Site is currently zoned as Green Belt but does not contribute greatly to the setting of the City. The site does not have a strong relationship with the City Boundary or Westhill. The current Green Belt zoning does not represent a reason not to allocate the land and no review of the Green Belt has been carried out to support the retained boundaries. Development would represent a natural southern extension to Prime Four. The character of the area is changing with allocations near to the Bid Site. Do not agree that the A944 provides a strong and identifiable Green Belt boundary. Bid site should have scored higher on landscape. Site is free from constraints. Approach to employment land is overly simplistic and contends that additional allocations in appropriate places should be supported and B0926 represents an opportunity. There should be no maximum limit applied. Development in this location takes advantage of upgraded local and region-wide road network. Located adjacent to Park and Ride and Core Path Network. Respondent includes several supporting documents pertaining to the bid for development and Main Issues Report response.

833: Undesirable for following reasons: Pylons, Green Belt, sloping and visible in landscape. A944 provides strong and identifiable Green Belt boundary separating Prime Four and Kingswells from countryside to the south. Should remain as Green Belt. Increased risk of coalescence. Commercial development with possible private healthcare facility would likely attract traffic movements at an already busy area.

Bid Site B0933 - Damhead/Cadgerford/Backhill

730, 833: Support undesirable status and decision not to allocate in the Proposed Local Development Plan. Object to development proposal. Major gas pipeline west of the site constrains the proposal while the Brodiach Burn located west of site and associated significant high risk of flooding per Scottish Environment Protection Agency flood map. Development in this location would be highly visible due to the rolling agricultural landscape. The site serves the Green Belt function of maintaining landscape setting and identities of Kingswells and Westhill, and there is a risk of coalescence with Lower Deeside/Kingswells. Development of this scale would be an expansion of Westhill, would have a significant impact on services in Westhill, but does not relate well to the settlement of Westhill. The site is not required to meet Aberdeen City and Shire Strategic Development Plan 2020 housing land target. The capacity of education and other services is a concern. The development will likely be car dependent due to proximity to retail and community facilities. Rerouting or upgrading the Forties pipeline is unlikely to be supported by the pipeline operator.

886: Object to failure to allocate or remove from Green Belt land for residential and employment development at Westhill. Presents a high level strategy for the southerly expansion of Westhill on land in both the Aberdeen City Council and Aberdeenshire Council boundaries. Westhill is identified within a Local Growth Area per Aberdeen City and Shire Strategic Development Plan 2020, located adjacent to the Aberdeen Strategic Growth Area and in the Aberdeen Housing Market Area where 80% of all new housing is

directed. However both Councils have failed to allocate sufficient land for housing and employment in the sustainable and marketable settlement of Westhill. Respondent asserts that the Aberdeen City and Shire Strategic Development Plan 2020 offers support for growth in locations outwith the Strategic Growth Areas. In recognition of cross boundary benefits, land at East Arnhall was allocated and a similar approach is advocated for the Bid Site. A summary of population, available facilities and businesses located in Westhill is provided. The site location is strategic and further enhanced by the Aberdeen Western Peripheral Route with public transport links and connections by foot and cycle. Westhill is a sustainable location on the edge of the City and in accordance with directive for sustainable development further allocations are sought to balance out the residential and employment uses. Aberdeen City Council acknowledged the benefits of development around the City edge through the grant of consent for new Community and Sports Facilities and Stadium at Kingsford. Respondent disputes the Council's Development Options Assessment and Strategic Environmental Assessment in terms of impact on landscape designated sites and Green Belt function. The Council have not produced a Landscape Impact Assessment to conclude that development at the Bid Site would impact on the wider landscape and adversely affect the separation of Kingswells and Westhill. Refers to Aberdeenshire Council's Westhill Capacity Study and states that the Bid Site scored favourably in the Study's assessment. The Bid Site has the potential to be an early and critical first phase component in the planned, sustainable growth of the town across both local authority areas towards its natural southern boundaries for employment, retail and housing with circa 3000 houses proposed. Developing the site can help to deliver improvements to infrastructure (roads, education and provision of land to meet demand for both employment and residential uses. Pipelines are not a finite constraint to development and the Development Framework has arranged for consideration of Scottish Environment Protection Agency flood risk maps. Westhill has performed a strategic function in terms of provision of employment and housing land. It is not just a commuter suburb with more than 25% of its residents retained in employment in Westhill rather than commuting. Effective forward planning should be used to address and facilitate strategic infrastructure improvements through an appropriate scale of additional development allocation. The Bid Site should be allocated as first phases of a wider masterplanned area in line with the overall Westhill Capacity Study and supporting documents.

Modifications sought by those submitting representations:

OP29 - Prime Four Kingswells

859: Allow other non-Class 4 uses considered appropriate or complementary. Other modifications sought to Appendix 2 - see Issue 41: Glossary and Appendices 1-5.

OP30 -Kingsford

944: Remove from Green Belt allocation and rezone as mixed use.

OP63 - Prime Four Extension

859: Other modifications sought to Appendix 2 - see Issue 41: Glossary and Appendices 1-5.

Bid Site B0302 - Gillahill, Kingswells

753: Requests that site is removed from Green Belt and identified as an Opportunity Site for residential development, a primary school and civic space. Failing this, request the site is identified as Strategic Reserve Land for the period 2033-2040.

Bid Site B0303 - Land at Sunnyfield, Kingswells

571: Allocate B0303 as an Opportunity Site for the development of affordable housing (suitable for indicatively 23 units).

Bid Site B0305 - Gateside Farm

605: Allocate B0305 for residential development.

Bid Site B0309 - Derbeth, Kingswells

900: Allocate land at Derbeth (as set out in Document DER1) for both a development in the period 2020 to 2032, but also as Strategic Reserve.

Bid Site B0311 - Prime Four North

859: Allocate B0311 for residential development of 90 units.

Bid Site B0312 - East Kingsford and Industrial Park Area

859: Allocate B0312 for potential roadside services, including refuelling and food/drink uses. Also rezone the Kingsford industrial park area from Green Belt to Business and Industry (including the B0312 site).

Bid Site - B0314 Maidenraig North West 1 and Bid Site - B0315 Maidenraig North West

2

862: Site should be allocated for either 100 homes and commercial retail use or 200 homes.

Bid Site B0926 - Huxterstone

862: Site should be included as a healthcare and employment land allocation.

Bid Site B0933 - Damhead/Cadgerford/Backhill

886: Allocate land within Aberdeen City at Damhead, Cadgerford and Backhill for between 650 - 750 houses and around 5.8 hectares of employment land; or remove from Green Belt and identify as 'Strategic Reserve'.

Summary of responses (including reasons) by planning authority:

General Strategy

In preparing the Proposed Local Development Plan a Development Options Assessment (CDXX), Strategic Environmental Assessment (CDXX), and Main Issues Report (CDXX) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield Opportunity Sites (OP sites) identified in the Proposed Local Development Plan have been carried over from the extant Local Development Plan 2017 (CDXX) which went through a similar site assessment process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Delivery Programme (CDXX). In the immediate locality at Prime Four (OP29), Countesswells (OP38) and Maidencraig (OP31 and OP32) construction is well under way.

The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) sets the requirements for greenfield housing and employment land allowances and these are set out in Table 3 and Table 4 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX), and are reflected within the Proposed Local Development Plan Spatial Strategy. Paragraph 3.14-3.16 of the Proposed Local Development Plan affirms that it was not necessary to identify any further employment land owing to there already being a healthy supply of marketable employment land available. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states, "*new allocations should consider opportunities to reuse brownfield land and attempt to utilise the current "constrained" supply in the first instance. However; it is likely that some new development will need to take place on greenfield sites in order to help deliver the Vision and future strategy for growth...Allocations should be of a scale which would not inhibit the delivery of current strategic allocations and should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise*". There is a requirement for at least 40% of all new housing in Aberdeen City to be on brownfield sites. Under Issue 2: Housing Land, we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Accordingly, we do not consider it necessary to allocate any further greenfield sites or employment sites beyond those already identified in the Proposed Local Development Plan.

OP29 - Prime Four Kingswells

497, 859: OP29 is zoned as a Business Zone. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) asks the Proposed Local Development Plan to protect allocated employment land from other uses. An application for detailed planning permission (181336/DPP) for erection of three Class 3 (food and drink) units including two drive-thru facilities on land adjacent to Veterinary Hospital Kingswells went before the Planning Development Management Committee on 18 April 2019. The Council took a view (CDXX) which placed greater weight of development at the site and concluded that it would service the nearby Prime Four Business Park employees, have a positive economic

impact, add to limited local amenities for residents thus outweighing adopted policy on the location of such uses. The relatively small area of land within OP29, subject to conditional planning approval via 181336/DPP, compared to the overall site size of OP29 does not justify a flexible approach for other non-specified uses to the overall OP29 Business Zone area. This would remove the certainty which the Proposed Local Development Plan aims to provide, could undermine the high-quality environment that the Council is seeking to create within dedicated business zoned land, and would likely be contrary to the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and Scottish Planning Policy (CDXX). Further, the Proposed Local Development Plan does not allocate Class 3 uses under a particular zoning.

Issue 37: Policies B1, B2, B3 - Supporting Business and Industry, Airport addresses similar requests for a flexible approach in terms of Proposed Policy B2 Business Zones which aims to safeguard land for high quality employment uses and concludes that it would not be appropriate to include specific Use Classes that may or may not be acceptable. Applications are treated on their own merits and should an application for non-Class 4 uses be considered appropriate or complementary this would be determined on a case by case basis weighing up the relevant planning policy considerations. As such, there are insufficient over-riding benefits to justify the amendment sought to OP29 and no change is required. See also Issue 41: Glossary and Appendices 1-5 for other site allocation modifications sought by respondent.

OP30 - Kingsford

944: An application for detailed planning permission (170021/DPP) for Proposed Community and Sports Facilities, Football Academy, (comprising outdoor pitches, pavilion, ancillary buildings), Stadium (20,000 capacity), ancillary uses, formation of access roads, parking and associated landscaping and engineering works at Land At West Kingsford (North Of The A944 Road) Skene Road Aberdeen AB15 8QR went before Aberdeen City Council on 29 January 2018 and was approved, subject to Conditions and a legal agreement. The Committee Report (CDXX) details in depth the extensive pre-determination procedures and evaluation of the proposal which was granted under exceptional circumstances as outlined in the Report. The site is identified as an Opportunity Site to reflect the consent and completion of the Training Facility in 2019. The area acts as a buffer between Kingswells and Westhill, and contributes towards preventing coalescence and maintaining the individual identity of those two communities. As such, it contributes to the landscape setting of the City which is a Green Belt function. Any further intensification of use on the site will further erode that function and the distinct sense of place that exists in both Westhill and Kingswells. Whilst elements of the proposal (training pitches) were considered compatible with the Green Belt policy or the aims of policy to maintain openness of the Green Belt and visual separation between settlements, the mixed use zoning sought would not.

As the entirety of the proposal has not been completed it would be inappropriate to rezone the land when the stadium does not yet exist. The Opportunity Site (OP) designation and NE1 Green Belt status designations are entirely appropriate in terms of the Green Belt purposes set out in Scottish Planning Policy (CDXX) and under the unique circumstances the OP designation should retain its designation as Green Belt. The Reporter, at the Examination of the extant Local Development Plan 2017 (CDXX) concluded under Issue 30: Policy NE2 – Green Belt (CDXX) that *“There is no requirement to review boundaries in preparing a local development plan, unless the planning authority considers such a review*

necessary. *The Aberdeen City and Shire Strategic Development Plan 2020 does not call for significant new releases of Green Belt land for development, and so a general review of Green Belt boundaries is not necessary.*” As the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) also does not call for significant new release of Green Belt land for development there still remains no need to undertake a general review of the Green Belt boundaries. No change is required.

OP63 - Prime Four Extension

859: OP63 is zoned as a Business Zone. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) asks the Local Development Plan to protect allocated employment land from other uses. The flexible approach sought would remove the certainty which the Proposed Local Development Plan aims to provide, could undermine the high-quality environment that the Council is seeking to create within dedicated business zoned land, and would likely be contrary to the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and Scottish Planning Policy (CDXX). Issue 37: Policies B1, B2, B3 - Supporting Business and Industry, Airport addresses the similar request for flexible approach in terms of Policy B2 Business Zones which aims to safeguard land for high quality employment uses, and concludes that it would not be appropriate to include specific Use Classes that may or may not be acceptable. Applications are treated on their own merits and should an application for non-Class 4 uses be considered appropriate or complementary this would be determined on a case by case basis weighing up the relevant planning policy considerations. As such, there are insufficient over-riding benefits to justify the amendment sought to OP63 and no change is required. See also Issue 41: Glossary and Appendices 1-5 for other site allocation modifications sought by respondent.

Bid Site B0302 - Gillahill, Kingswells

753: Site B0302 was not supported as an allocation and as such it is not identified as an Opportunity Site (OP site) in the Proposed Local Development Plan. The merits of B0302 have been considered and rejected at the last two Local Development Plan Examinations as part of Issue 35: Alternative Sites - Kingswells (CDXX) for the Local Development Plan 2012 and Issue 8: Alternatives Sites – Kingswells and Greenferns (CDXX) for the extant Local Development Plan 2017. The Reporter noted under Issue 35: Alternative Sites - Kingswells (CDXX) to the Local Development Plan 2012 “*The Green Belt designation of the elevated Gillahill site is justified by its agricultural use and the prominence of any potential development there which would encroach into the countryside setting which separates Kingswells from the main built-up area of the city.*” Further stating “*not over-riding benefits which justify its allocation for development now*”. Under Issue 8: Alternatives Sites – Kingswells and Greenferns (CDXX) to the extant Local Development Plan 2017 the Reporter noted that “*Development would result in a significant encroachment into the existing open gap between Kingswells and Aberdeen.*” Further concluding “*I consider that the ongoing Green Belt status of these sites remains appropriate*”. There has been little significant change in circumstances over that period to warrant a different view now. Noting the General Strategy response above, we conclude, under Issue 2: Housing Land, that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan. The issue of Strategic Reserve was discussed within

Issue 14: Our Communities – Additional Housing Allocations (CDXX) during the examination of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The Reporter concluded that “*Scottish Planning Policy does not require the allocation of a “strategic reserve” but only an indication of the possible scale and location of future housing.*” The Reporter further concluded “*Although promoted by parties, I find that it would be unreasonable to require local development plans to include a strategic reserve*”. The Proposed Local Development Plan (see Section 3. The Spatial Strategy and specifically paragraph 3.13) does not identify Strategic Reserve Land for housing and therefore sites cannot be identified as such. This issue is further discussed in Issue 1: Vision, Spatial Strategy and Land Release Policy LR1. No change is required.

Bid Site B0303 - Land at Sunnyfield, Kingswells

571: Bid Site B0303 was not supported as an allocation and as such it is not identified as an Opportunity Site (OP site) in the Proposed Local Development Plan. An application for planning permission in principle (191034/PPP) for the erection of 30 affordable dwellinghouses went before the Planning Development Management Committee on 23 January 2020 (CDXX). The Council took a view which placed greater weight of development at the site and the application was approved subject to Conditions and a legal agreement. The planning application process is a separate function of the planning system to the Development Plan. The decision notice was not signed until November 2020 (CDXX) and after the formal consultation period for the Proposed Local Development Plan. At the time of writing, a Matters Specified in Conditions application is currently pending (201553/MS). As the site has received planning permission in principle it is not deemed necessary to identify it as an Opportunity Site (OP site). Grant of planning permission in principle does not guarantee that the Matters Specified in Conditions will be met or that the development will be initiated within the time limits of the consent. The zoning remains appropriate until such time the development is completed and the next iteration of the Local Development Plan can reflect this. No change is required.

Bid Site B0305 - Gateside Farm

605: Bid Site B0305 was not supported as an allocation and as such it is not identified as an Opportunity Site (OP site) in the Proposed Local Development Plan. Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at Maidencraig (OP31 and OP32). Further we conclude, under Issue 2: Housing Land, that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan. The site is highly visible and forms part of the Green Belt and Green Space Network. The responsibility of upkeep and maintenance of land lies with the landowner and is not a matter for the Development Plan process. No change is required.

Bid Site B0309 - Derbeth Kingswells

730: Support is noted and welcomed.

810: Bid Site B0309 was not supported as an allocation and as such it is not identified as an Opportunity Site (OP site) in the Proposed Local Development Plan. Noting the General Strategy response above, we conclude, under Issue 2: Housing Land, that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan. Under the Vibrant City section of the Proposed Local Development Plan, and in responses made in Issue 32: Policies VC1, VC2, VC3, VC4 and VC5 – Vibrant City and Issue 33: Policies VC8, VC9, VC10, VC11 and VC12 – Supporting Centres, we set out a Vision and strategy for the City Centre which includes support for reutilising vacant units, increasing residential living and increasing footfall in conjunction with the Aberdeen City Centre Masterplan and Delivery Programme (CDXX).

900: The merits of Bid Site B0309 have been considered and rejected at the last two Local Development Plan Examinations as part of Issue 35: Alternative Sites - Kingswells (CDXX) for the Local Development Plan 2012 and Issue 8: Alternatives Sites – Kingswells and Greenferns (CDXX) for the extant Local Development Plan 2017. The Reporter concluded that the Green Belt status of this site was justified by reasons of protecting the setting of Kingswells and preventing encroachment into the countryside that separates Kingswells from Aberdeen. The inclusion of a Primary School as part of the development proposals does not alleviate the overriding Green Belt /impact on landscape issue. Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) stipulated limited need for additional housing land, of which priority should be brownfield and then constrained supply in the first instance. Large scale allocations such as that proposed at the Bid Site would likely be contrary to the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). In any case we conclude that it was not necessary to allocate further greenfield sites beyond those already identified in the Proposed Local Development Plan. The issue of Strategic Reserves was discussed within Issue 14: Our Communities – Additional Housing Allocations (CDXX) during the Examination of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The Reporter concluded that “*Scottish Planning Policy does not require the allocation of a “strategic reserve” but only an indication of the possible scale and location of future housing.*” The Reporter further concluded “*Although promoted by parties, I find that it would be unreasonable to require local development plans to include a strategic reserve*”. The Proposed Local Development Plan (see Section 3. The Spatial Strategy and specifically paragraph 3.13) does not identify Strategic Reserve Land for housing and therefore sites cannot be identified as such. Strategic Reserve is also discussed in Issue 1: Vision, Spatial Strategy and Land Release Policy LR1. The Reporter, at the Examination of the extant Local Development Plan 2017 (CDXX) concluded under Issue 30 - Policy NE2 – Green Belt (CDXX) that “*There is no requirement to review boundaries in preparing a local development plan, unless the planning authority considers such a review necessary. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not call for significant new releases of Green Belt land for development, and so a general review of Green Belt boundaries is not necessary.*” As the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) also does not call for significant new release of Green Belt land for development there still remains no need to undertake a general review of the Green Belt boundaries. No change is required.

Bid Site B0310 – Prime West

730: Support is noted and welcomed.

Bid Site B0311 - Prime Four North

859: Bid Site B0311 was not supported as an allocation and as such it is not identified as an Opportunity Site (OP site) in the Proposed Local Development Plan. Noting the General Strategy response above, we conclude, under Issue 2: Housing Land, that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan. Again, noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) stipulated limited need for additional housing land, of which priority should be brownfield and then constrained supply in the first instance. In any case we conclude that it was not necessary to allocate further greenfield sites beyond those already identified in the Proposed Local Development Plan. The Bid Site, edged by the Kingswells Consumption Dyke, provides a robust Green Belt boundary to the Prime Four development to the south. Development of this site would intrude into the surrounding landscape, alter the views from the Aberdeen Western Peripheral Route to the west, and encroach upon the open space between Kingswells and the Aberdeen Western Peripheral Route. There are no overriding benefits to developing the site that would justify its allocation in light of the General Strategy response above. No change is required.

Bid Site B0312 - East Kingsford and Industrial Park Area

730: Support is noted and welcomed.

859: Bid Site B0312 was not supported as an allocation and as such it is not identified as an Opportunity Site (OP site) in the Proposed Local Development Plan. The Bid Site, and wider industrial area, are within the Green Belt and serve a vital function in this area preventing the coalescence of Kingswells and Westhill. As noted in the Development Options Assessment (CDXX) the uses already taking place within the existing industrial units are in line with Green Belt policy and there is no need to rezone the existing units. A further intensification of use as proposed by the bid would likely not comply with the Green Belt policy although should a planning application be submitted its merits would be considered on a case by case basis in line with all relevant Development Plan policies. If existing use rights apply there is no need to formally identify the land as an Opportunity Site. There is no certainty that the 5-Mile garage will form part of any future development and, as detailed in earlier response above per land covered by 181336/DPP, the Local Development Plan does not allocate Class 3 uses under a particular zoning. To conclude we do not feel it would be appropriate to rezone a small section of the Green Belt as an Opportunity Site. No change is required.

Bid Site B0314 - Maidenraig North West 1 and Bid Site B0315 - Maidenraig North West

2

862: Bid Site B0314 was not supported as an allocation and as such it is not identified as an Opportunity Site (OP site) in the Proposed Local Development Plan. Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at Maidenraig (OP31

and OP32). Under Issue 2: Housing Land, we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Paragraph 3.14-3.16 of the Proposed Local Development Plan affirms that it was not necessary to identify any further employment land owing to there already being a healthy supply of marketable employment land available. Accordingly, we do not consider it necessary to allocate any further greenfield sites or employment sites beyond those already identified in the Proposed Local Development Plan. The merits of B0309 were considered and rejected at the last Local Development Plan Examination as part of Issue 8: Alternatives Sites – Kingswells and Greenferns (CDXX) for the extant Local Development Plan 2017. The Reporter concluded under Issue 8 “*Development would result in a major incursion into the open countryside gap between Aberdeen and Kingswells*” and that “*the site has a role in maintaining the landscape setting of the city and protecting the separate identities of Aberdeen and Kingswells*”. The Green Belt status is considered justified in terms of Scottish Planning Policy (CDXX). There has been little significant change in circumstances over that period to warrant a different view now and its allocation would likely not comply with the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). No change is required.

Bid Site B0316 - Smiddybrae

730: Support is noted and welcomed.

Bid Site B0926 - Huxterstone

833: Support is noted and welcomed. Bid Site B0926 was not supported as an allocation and as such it is not identified as an Opportunity Site (OP site) in the Proposed Local Development Plan.

786: As noted above under General Strategy, paragraphs 3.14-3.16 of the Proposed Local Development Plan affirms that it was not necessary to identify any further employment land owing to there already being a healthy supply of marketable employment land available. Accordingly, we do not consider it necessary to allocate any further greenfield sites or employment sites beyond those already identified in the Proposed Local Development Plan. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at Prime Four (OP29). The merits of B0926 were considered and rejected at the last Local Development Plan Examination as part of Issue 8: Alternatives Sites – Kingswells and Greenferns (CDXX) for the extant Local Development Plan 2017. The Reporter concluded under Issue 8 “*the openness of this land does fulfil Green Belt functions as outlined in Scottish Planning Policy, and that therefore the current Green Belt status is justified.*” The Reporter further noted that demand for a private healthcare facility is not the same as a proven need for a public healthcare facility and does not justify the development of this particular site. In the context of extensive employment land allocations already made across the City, and specifically immediately adjacent at both Prime Four (OP29) and Countesswells (OP38), there has been little significant change in circumstances over that period to warrant a different view now and its allocation would likely not comply with the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). As noted in the Development Options

Assessment (CDXX) the A944 provides a robust and easily identifiable Green Belt boundary in this location which clearly separates Kingswells from the countryside to the south. The Reporter, at the Examination of the extant Local Development Plan 2017 (CDXX) concluded under Issue 30: Policy NE2 – Green Belt (CDXX) that *“There is no requirement to review boundaries in preparing a local development plan, unless the planning authority considers such a review necessary. The Aberdeen City and Shire Strategic Development Plan 2020 does not call for significant new releases of Green Belt land for development, and so a general review of Green Belt boundaries is not necessary.”* As the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) also does not call for significant new release of Green Belt land for development there remains no need to undertake a general review of the Green Belt boundaries. No change is required.

Bid Site B0933 - Damhead/Cadgerford/Backhill

730, 833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

886: Bid Site B0933 was not supported as an allocation and as such it is not identified as an Opportunity Site (OP site) in the Proposed Local Development Plan. Noting the General Strategy response above, we conclude, under Issue 2: Housing Land, that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and do not consider it necessary to allocate any further greenfield sites or employment sites beyond those already identified in the Proposed Local Development Plan. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) stipulated limited need for additional housing land, of which priority should be brownfield and then constrained supply in the first instance. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states at paragraph 4.19 that: *“Allocations should be of a scale which would not inhibit the delivery of current strategic allocations and should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise”*. Site B0933 is not located within a Strategic Growth Area per the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and is of an overall scale which may inhibit delivery of other strategic allocations such as at nearby Prime Four (OP29) and Countesswells (OP38). As such its allocation would likely not comply with the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The issue of Strategic Reserves was discussed within Issue 14: Our Communities – Additional Housing Allocations (CDXX) during the examination of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The Reporter concluded that *“Scottish Planning Policy does not require the allocation of a “strategic reserve” but only an indication of the possible scale and location of future housing.”* The Reporter further concluded *“Although promoted by parties, I find that it would be unreasonable to require local development plans to include a strategic reserve”*. The Proposed Local Development Plan (see Section 3. The Spatial Strategy and specifically paragraph 3.13) does not identify Strategic Reserve Land for housing and therefore sites cannot be identified as such. This issue is further discussed in Issue 1: Vision, Spatial Strategy and Land Release Policy LR1.

The merits of B0302 have been considered and rejected at the last two Local Development Plan Examinations as part of Issue 37: Alternative Site – Cadgerford Farm (CDXX) for the Local Development Plan 2012 and Issue 12: Alternative Sites - Deeside (CDXX) for the extant Local Development Plan 2017. The Reporter noted under Issue 37 to the Local Development Plan 2012 that *“it lies beyond the line of the Aberdeen Western Peripheral Route. It would represent a prominent extension of Westhill across the B9119*

road, which currently forms its southern boundary, and into an area of open countryside. It is not well located to function as an integral part of the village". Further noting "The site's location within a pipeline notification \one would also be likely to limit its development potential, particularly for housing." The Reporter noted under Issue 12 to the extant Local Development Plan 2017 that "The strategic development plan does not call for such an expansion and does not place Westhill in a strategic growth area." Development "would not relate well to the existing built-up area or to facilities and services" further adding "site is prominently located in the Green Belt and development there would affect the landscape setting of Westhill." The Reporter concluded "I do not consider that there is a need for either residential or commercial development on this scale that would outweigh the disadvantages of the site which I have described."

As stated above in response to OP30 Kingsford, the consent was granted under exceptional circumstances rather than being the rule and its approval should not be translated that growth around the City edge is acknowledged as being beneficial.

Allocation of the Bid Site without the counterpart allocation in Aberdeenshire would not relate well to the settlement of Westhill. It serves the Green Belt function of maintaining the separate identities of Kingswells and Westhill. Further the site will be significantly constrained by the presence of a major gas pipeline and there is significant flood risk from the Broadiach Burn. In summary, there is no requirement for additional housing or employment land, the proposal is of a scale which may inhibit other strategic allocations, and its allocation would likely not comply with the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). No change is required.

Reporter's conclusions:

Reporter's recommendations:

Issue 9	ALLOCATED SITES AND GENERAL AREA STRATEGY: COUNTESSWELLS	
Development plan reference:	Pages 28 - 29, Appendix 2, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Leigh-Ann McKenzie (192) Nina Ashby (496) Bill Roadnight (570) Stewart Milne Homes (717)</p>		
Provision of the development plan to which the issue relates:	Opportunity Site at Countesswells	
Planning authority's summary of the representation(s):		
<p><u>Countesswells Area</u></p> <p>496: Objects to development around Countesswells area due to loss of open space and trees. Proposals will result in loss of accessible green walk from Garthdee to Hazlehead/Countesswells and Cults wood.</p> <p><u>OP38 - Countesswells</u></p> <p>192: Queries whether there will be opportunities to start up a business in this area.</p> <p>717: Welcomes the continued zoning of Countesswells. Development commenced in April 2016 and significant progress has been made in terms of homes occupied, school provision and road infrastructure, retail provision and parks.</p> <p>Flexibility is required within the Local Development Plan to ensure development can change to meet market demand over the lifetime of the project. The key principles outlined on page 25 of the Plan may change over the 10 year lifespan on the Plan, therefore less detail is required in the Plan. It is noted and agreed that the Development Framework will be a material consideration in the determination of future planning consents.</p> <p>Clarification is sought on the requirement to provide 10 hectares of employment land, as this is not consistent with approved Development Framework. A mix of uses, with employment uses mixed vertically and horizontally throughout the community will ensure vibrancy and sustainability rather than the requirement to zone 10 hectares of employment land.</p> <p>Employment uses in Aberdeen have changed significantly since 2014. With the provision of new large scale office developments and the change in oil price, combined with the aftermath of the COVID-19 pandemic, there has been a demand for smaller flexible employment premises. Smaller scale, but higher density employment uses can be</p>		

accommodated in Countesswells, adding to the potential to form part of an active neighbourhood centre/ local town centre.

Countesswells Development Framework and Masterplan Addendum Supplementary Guidance

570: With reference to paragraphs 9.8.9 and 10.1 of the Countesswells Development Framework and Masterplan Addendum Supplementary Guidance:

9.8.9 Concern over the likely routing of traffic from Kingswells area going south through Countesswells settlement which is not compatible with the objective for pedestrian friendly settlement. It is unrealistic to expect residents travelling from Kingswells and further north to North Deeside Road via the Aberdeen Western Peripheral Route adding additional miles to journeys against the tone of the Proposed Local Development Plan. This would add to congestion in the North and South Deeside Road areas. People will continue to travel from Kingswells Roundabout to Cults.

10.1 No reference is made to traffic travelling through the Countesswells Settlement to Cults and Industrial Estates on southern edge of city.

Only solution to 9.8.9 and 10.1 is to construct a Countesswells bypass, similar to Kingswells. If Kingswells bypass was not there the chaos would be unimaginable.

Modifications sought by those submitting representations:

Countesswells Area

496: Restoration in place of new development. Encourage more allotments, plant more woods and develop more green corridors for recreational use.

OP38 - Countesswells

192: Increase active travel route to the City Centre and provide allotments.

717: Recognise the need for flexibility through the life of the development and that there will be amendments to the Development Framework and Masterplan during the life of the Proposed Local Development Plan. Delete reference to 10 hectares of employment land.

Countesswells Development Framework and Masterplan Addendum Supplementary Guidance

570: Construct a bypass around the Countesswells Settlement, to preserve peace, and calm of design objectives per the Masterplan.

Summary of responses (including reasons) by planning authority:

Countesswells Area

496: In the Countesswells area the Proposed Local Development Plan does not identify new Opportunity Sites (OP sites) over the extant Local Development Plan 2017 (CDXX) other than one proposal at OP42 for a hotel and equestrian centre which has already received planning permission. The other allocations were identified in the Local

Development Plan 2012 (CDXX) and again through the Aberdeen Local Development Plan 2017 (CDXX) following favourable consideration at the last Examination through Issue 9: Allocated Sites and General Area Strategy - Countesswells (CDXX). The principle of development in this area is therefore long established and it remains appropriate to retain these development opportunities as there has been no significant change in circumstances to justify an amendment to the designations.

Between the urban edge of Aberdeen City and Countesswells there is a significant area of Green Belt and Green Space Network which are both protective land zonings. Specifically at Countesswells the site is subject to an approved Development Framework and Phase 1 Masterplan (CDXX and CDXX) and construction is underway. The intention is for this document to be taken forward as Aberdeen Planning Guidance where it will be material in determining planning proposals. Environmental concerns were considered through the Examination process of the extant Local Development Plan 2017 (CDXX) in Issue 9: Allocated Sites and General Area Strategy - Countesswells (CDXX) where it was stated that boundaries had been drawn to reduced impact on adjacent woodland areas and retention of Green Space Network would be used to maintain a wildlife corridor through the site. The Reporter concluded that the Development Framework and Phase 1 Masterplan (CDXX and CDXX) and associated planning permissions provided for parks, green spaces and woodland planting within the development. There is no reason why allotments cannot be provided as part of the development sites and the Development Framework and Phase 1 Masterplan (CDXX and CDXX) indicates provision for such in Figure 104 on page 57. The Reporter also stated that it is not possible to provide sufficient housing land without some greenfield development. Modifications sought are not supported or required.

OP38 - Countesswells

192: The Development Framework and Phase 1 Masterplan (CDXX and CDXX) contains a dedicated section to Access and Connectivity Strategy with details on pedestrian, cyclist, equestrian, connectivity within the site and to external connections outwith the site. Figure 106 on page 63 provides indicative paths/routes showing linkages to a wider network outwith the boundaries of the allocated site. It is important to note that the developer can only provide routes on land within their control. As detailed above there is no reason why allotments cannot be provided as part of the development site and the Development Framework and Phase 1 Masterplan (CDXX and CDXX) indicates provision for such in Figure 104 on page 57. Modifications sought are not supported or required.

717: Support for the continued allocation is supported and welcomed. This Local Development Plan has to be consistent with the requirements of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) in order to comply with Section 16 (6) of the Town and Country Planning (Scotland) Act 1997, as amended (CDXX). This means it must allocate housing and employment land in accordance with Tables 1 to 4 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The figures used for allocating sites in the Local Development Plan should be as precise as possible in order to be able to demonstrate compliance. The allocation of 3,000 houses and 10 hectares of employment land at Countesswells has been consistent since it was first identified in the Local Development Plan 2012 (CDXX). Our approach provides clarity, consistency and confidence for both developers and the public. It has been suggested that the employment land element of OP38 should be removed and to allow a mixture of uses. Table 4 of the Proposed Local Development Plan sets out the Employment Land Allocations which are consistent with the requirements of the Aberdeen City and Shire

Strategic Development Plan 2020 (CDXX). We would accept that both the local and national economy is facing difficult times for various reasons and this is making life difficult for many businesses to operate. This means it is even more important to protect the interests of businesses. The primary way that the planning system can do that is to ensure that there is a generous and varied supply of dedicated employment land available at all times. In addition, it is important to ensure that larger developments, like Countesswells, should include both housing and employment elements and that mixed-use communities are encouraged. This helps to reduce travel requirements, encourages walking and reduces car-dependence. Furthermore, an appropriate mixture of uses could be acceptable in residential areas, provided they are compatible with residential uses.

More details of what is to be expected at OP38 are set out in the Development Framework and Phase 1 Masterplan (CDXX and CDXX). It is not agreed that the allocation is inconsistent with the Development Framework and Phase 1 Masterplan (CDXX and CDXX) as the requirement for 10 hectares of employment land and references to employment uses are detailed throughout the two parts. Furthermore, the details of a large development are likely to change over time and this is why such specifics are more appropriately expressed in a Development Framework or Masterplan as they can also be more easily amended than a Local Development Plan in response to changing circumstances.

A reduction of the employment land element was sought and considered through the Examination process of the extant Local Development Plan 2017 in Issue 9: Allocated Sites and General Area Strategy - Countesswells (CDXX) and the Reporter recognised that the Development Framework provided flexibility and concluded "*I do not consider that there are grounds at this stage for reducing the 10 hectares provided in the proposed plan.*" For these reasons we would not wish to delete reference to 10 hectares of employment land as this remains a required and necessary part of the allocation. The modification sought is not supported or required.

Countesswells Development Framework and Masterplan Addendum Supplementary Guidance

570: The larger sites that have been carried over are subject to approved Development Frameworks and Masterplans, including both parts of the Countesswells Development Framework and Masterplan (CDXX and CDXX). The Countesswells development is well underway with many homes being occupied and, as such, the majority of the site layout and infrastructure principles have already been established. The key infrastructure requirements for OP38 have been assessed and, where appropriate, included within the extant Local Development Plan 2017 (CDXX) and carried forward to the Proposed Local Development Plan. The intention is for these documents to be taken forward as Aberdeen Planning Guidance where they will be material in determining planning proposals. Details of a large development can change over time and this is why specific and detailed issues such as roads layout is not a matter for inclusion within a Local Development Plan. The masterplanning process and subsequent planning applications consider these issues and can adapt over time where considered appropriate. Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporter's have no locus on these matters. No change is required.

Reporter's conclusions:

Reporter's recommendations:



Issue 10	ALTERNATIVE SITES: COUNTESSWELLS	
Development plan reference:	No reference in Plan	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Christopher Venn (46) Michael Robertson (190) Residents of Craigdon Road/Craigbank Area (356) Lyn Bell (600) Westhill and Elrick Community Council (686) Stewart Milne Homes (717) Cults, Bieldside and Milltimber Community Council (833) Dr Alan Moulton and Family (861) Tesco Stores Limited (955)</p>		
Provision of the development plan to which the issue relates:	Alternative sites at Countesswells	
Planning authority's summary of the representation(s):		
<p><u>Bid Site B0904 - Land Adjacent to Countesswells</u></p> <p>833: Object to development proposal. General agreement with Local Development Plan Team regarding developer proposals in the Community Council area within Ward 9 Deeside. Constraints: Green Space Network, Green Belt, proximity and accessibility to local services and facilities, school capacity, Ancient Woodland. Site is undesirable and unsuitable for development as it would remove valuable green space, increase risk of coalescence between settlements, local services and facilities are not easily accessible and would be car dependent, capacity infrastructure constraints in education (Cults Primary School and Cults Academy) and healthcare and is not needed to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing requirements. Education capacity needs to be addressed before any more homes are built in the area. Proposal would not contribute to better land use or mix. Allocation of this site would likely be contrary to the Aberdeen City and Shire Strategic Development Plan 2020 which seeks use of brownfield/constrained land first, reduction of car dependency in greenfield sites is important, allocations should be small scale and not extensions to existing development sites which have been subject to masterplanning (Countesswells). Does not meet Policy H3 minimum density requirements.</p> <p><u>Bid Site B0908 - Countesswells</u></p> <p>833: Object to development proposal. Site is unsuitable for development. General agreement with Local Development Plan Team regarding developer proposals in the Community Council area within Ward 9 Deeside. Support undesirable recommendation. Constraints: Foggieton Local Nature Conservation Site, Ancient Woodland, Green Space Network, Green Belt, School Capacity. Site contains priority habitats, located within a</p>		

Local Nature Conservation Site, Green Space Network and Green Belt. Site is remote, isolated from services and active travel/public transport is limited. Site would likely be car dependent. Site would remove valuable green space/ Green Space Network and increase risk of coalescence. Site would introduce school capacity issues. Proposal does not meet Policy H3 minimum density requirements. Allocation of this site would likely be contrary to the Aberdeen City and Shire Strategic Development Plan 2020 which seeks use of brownfield/constrained land first, reduction of car dependency in greenfield sites is important, allocations should be small scale and not extensions to existing development sites which have been subject to masterplanning (Countesswells). The proposal is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing land requirements.

Bid Site B0921 - Countesswells Expansion

46: Not enough facilities (shops/schools) in the Cults/Kingswells areas to support further housing until new amenities are built. Without facilities the new developments will lead to increased car use with no practical alternatives.

686: Concerns regarding traffic impact on A944 and road infrastructure if site taken forward.

833: Object to development proposal. General agreement with Local Development Plan Team regarding developer proposals in the Community Council area within Ward 9 Deeside. Agree with exclusion of proposal from the Proposed Local Development Plan. Constraints: Green Belt, Green Space Network, Coalescence, loss of woodland, disturbance to designated species. All areas of the proposal are undesirable for development. Existing site OP38 sits within a natural basin and is not readily visible from wider Aberdeen area. However, proposal would be visually intrusive and have detrimental impact on landscape, lead to loss of woodland and disturbance to designated species and their habitats. All areas have been subject to Examination via the extant Local Development Plan 2017 as part of Issues 10 (Bid Sites B0918 and B0924). A summary of the Reporter's comments is provided. The Aberdeen City and Shire Strategic Development Plan 2020 states that expansion of existing masterplanned sites should not be considered for allocation, and this is agreed with as the proposal represents expansion of an existing Masterplan area. Existing site OP38 is projected to build out at 200-250 units per year and not expected for completion beyond this Local Development Plan period. Adding additional land to OP38 allocation is not likely to increase housebuilding on the site in the next Plan period and should not be included in this Local Development Plan. The area will remain remote from facilities/public transport and remain car dependent until such time as services to Countesswells are provided. The proposal is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing allocation targets or meet Proposed Policy H3 density requirements. Development would result in the loss of valuable green space and increase risk of coalescence of settlements. Development would have detrimental impact on landscape, trees and disturbance to designated species and their habitats.

Bid Site B0921 - Site 2 Colthill

717: Object to the failure to identify Thornhill site 7 of Bid Site B0921 for development, either as an Opportunity Site or as Strategic Land Reserve. Separate representations have been submitted on Housing Land Supply and Strategic Land Reserve. The site could accommodate up to 175 homes. The site is currently in equestrian use, with part of the

landholding already zoned as part of OP38: Countesswells. The site is generally flat, south facing, with positive drainage opportunities. The site is well defined by stone wall field boundaries, Countesswells Road to the north and Hazelhead golf course. The site is located to the south west of Countesswells. It would be a distinctive, sustainable, modest and appropriately planned extension to Countesswells, and will make use of the facilities at Countesswells, and ensure these services remain viable. There will be minimal impact on landscape as the site is well contained and screened. The site is free from constraints. The Green Belt boundary around Countesswells should be reviewed to allow for appropriately planned future growth. The Green Space Network will be enhanced through increased access and recreational value, and the creation of wildlife corridors. Existing landscape features such as woodland will be retained and strengthened, creating opportunities to visual contain the development, mitigating any negative impacts on the character of the surrounding landscape, and increasing habitat networks. Appendix 2 provides a full response to the Bid assessment.

Bid Site B0921 - Countesswells Expansion Areas 2 and 7

356, 600: Supports the decision made by the Council not to allocate Countesswells Expansion Areas 2 and 7 (part of Bid Site B0921) in the Proposed Local Development Plan.

356: Copy of response to Main Issues Report consultation is attached which sets out the respondents full reasoning for considering the site to be undesirable for allocation. The respondent states that this accords with the Council's Officers assessment of the Bid Site and quotes from the Response to Main Issues Report Representation Schedule 4 assessment. The respondents agree and support the Council's conclusions and decision not to allocate site in the Proposed Local Development Plan and that no changes should be made to this position.

Bid Site B0921 - Site 3

46: Development of the site would put undue pressure on adjacent woods and require significant changes to the drainage of a low lying wet zone.

717: Object to the failure to identify site 3 of B0921 for development, either as an Opportunity Site or as Strategic Land Reserve. Separate representations have been submitted on Housing Land Supply and Strategic Land Reserve. The site could accommodate 54 homes, is well contained by woodland on the south and west, and by Kirk Brae and future development to the east, and mature landscaping to the north. The site is vacant and the remainder of the landholding is zoned as OP38: Countesswells. The site would be a distinctive, sustainable, modest and appropriately planned extension to Countesswells, and will make use of the facilities at Countesswells, and ensure these services remain viable. There will be minimal impact on landscape as the site is well screened. The site is free from constraints. The site was considered as strategic reserve land in the Aberdeen City Wide District Local Plan 1991. The Green Belt boundary around Countesswells should be reviewed to allow for appropriately planned future growth. The Green Space Network will be enhanced through increased access and recreational value. Existing landscape features such as woodland will be retained and strengthened, increasing habitat. Appendix 2 provide a full response to the Bid assessment.

Bid Site B0921 - Site 4, 5 and 6 Land at Mains of Countesswells

46: This zone should be protected as its development would remove the connecting corridor between the woods to the North and South of those sites.

717: Object to the failure to identify Site 4, 5, and 6 of B0921: Land at Mains of Countesswells for development, either as an Opportunity Site or as Strategic Land Reserve. Separate representations have been submitted on Housing Land Supply and Strategic Land Reserve. Site 4 can accommodate up to 75 homes: site 5 can accommodate 84 homes and site 6 can accommodate approximately 76 homes. The sites are currently in agricultural use and sit to the west of OP38: Countesswells. The sites would be a sustainable, distinctive, modest and planned extension to Countesswells, and will make use of the facilities at Countesswells, and ensure these services remain viable. There will be minimal impact on landscape as the site is well contained and screened. The site is free from constraints. The Green Belt boundary around Countesswells should be reviewed to allow for appropriately planned future growth. The Green Space Network will be enhanced through increased access and recreational value, and the creation of wildlife corridors. Existing landscape features such as woodland will be retained and strengthened, creating opportunities to visual contain the development, mitigating any negative impacts on the character of the surrounding landscape, and increasing habitat networks. Appendix 2 provide a full response to the Bid assessment.

Bid Site B0921 - Site 7 Thornhill

46: Site is too close to OP41 and would put pressure on the Countesswells development becoming continuous with Cults.

717: Object to the failure to identify Thornhill Site 7 of B0921 for development, either as an Opportunity Site or as Strategic Land Reserve. Separate representations have been submitted on Housing Land Supply and Strategic Land Reserve. The site could accommodate up to 100 homes. It is located south west of Countesswells and would be a sustainable and planned extension to Countesswells, and will make use of the facilities at Countesswells, and ensure these services remain viable. There will be minimal impact on landscape as the site is well contained and screened. The site is free from constraints. The Green Belt boundary around Countesswells should be reviewed to allow for appropriately planned future growth. The Green Space Network will be enhanced through increased access and recreational value, and the creation of wildlife corridors. Existing landscape features such as woodland will be retained and strengthened, mitigating any negative impacts on the character of the surrounding landscape and increasing habitat networks. Appendix 2 provide a full response to the Bid assessment.

Bid Site B0925 - Highview House

190: The site was deemed undesirable during the Main Issues Report and therefore not included in the Proposed Local Development Plan. The site, which is part of the Green Belt, is acceptable development and does not contravene Scottish Planning Policy's Green Belt objectives and provides no public access to open space. It's contained nature means that its development would not cause any coalescence and retaining the site as Green Belt does nothing to support regeneration. The respondent interprets the development bids assessment of the site as that of a 'linkage' green space rather than itself being valuable habitat. The site should not be referred to as woodland as it does not contain trees and therefore does not contribute to the Green Space Network as woodland. While the site is designated as Green Belt it is of limited habitat value. There will be considerable new facilities and employment opportunities resulting from the delivery of the

Countesswells development and access to services should be considered in that context. B0925 - Highview House, Countesswells would offer a mix of housing which would complement the overall housing allocations for the Proposed Local Development Plan. The Reporter in the Aberdeen City and Shire Strategic Development Plan 2020 Report of Examination discusses smaller sites offering complementary allocations for the delivery of new homes.

190: Commentary is provided on the Development Options Assessment scoring where Officers scored less than three. Slope: site topography can be overcome. Land use mix/balance/service thresholds: The mix offered by the Bid site should be viewed in the context of Countesswells rather than singularly. Service infrastructure capacity - five additional houses will place little additional burden on education resources. Landscape features/landscape fit: would have little visual impact on features such as the stone dyke and the site could be delivered working with such features. Direct footpath/cycle connection to community and recreation facilities and resources: site offers excellent foot and cycle links directly to Countesswells (including via core paths 50 and 55) and the facilities available there. Land use conflict should be scored as a 3 rather than 2 as the Officer's assessment states "*There is unlikely to be any conflicts arising from a residential use on this site.*" Additional constraints: disagrees with the assessment relating to Radon and asserts that it is one of the few areas of Aberdeen which has less than 1% radon potential. In addition, as the Assessment Report recognises, five houses can easily be accommodated on the site avoiding the existing pylon line.

833: Undesirable for following reasons: Green Belt, isolation so car dependent and no relationship to any existing settlement or easy access to facilities. Sloping and likely to be highly visible from South. Adjacent to Ancient Woodland.

Bid Site B0932 - Hillhead of Countesswells

833: Agree with recommendation. Undesirable for following reasons: Site is poorly related to Cults and western edge of city regarding public transport provision, community facilities and other amenities - would be car dependent. May result in loss of locally significant trees, would appear sporadic and isolated in rural context.

861: Supports the inclusion of the site in the Proposed Local Development Plan. Bid was to create small scale development of three houses on redundant scrubland within existing residential curtilage. Provides overview of sites' location adjacent to western edge of Airyhall/Pinewood area of Aberdeen. Site extends to 2.2 hectare and includes a residential property and stable block converted to residential use. Development site is 0.9 hectare unmaintained scrubland with a mature tree site perimeter with high screening ensuring minimal visual impact from small scale development. Site is bounded on all sides. Services available onsite with access taken from existing private driveway.

Development meets all requirements specified in the Main Issues Report for a greenfield development and would not impact the functionality of the Green Belt. Small scale development creating an additional three dwellings to the two already existing dwellings on a 2.2 hectare site. Development would have a limited impact on the environment with minimal carbon footprint. Comments made with regards to the use of ground source heat pumps, solar panels etc. Development will have a minimal visual impact on the environment due to the existing tree belt, additionally the design of the development would blend into the setting. Comments made in relation to the previous development on site achieving this. The development should have a limited impact on infrastructure as it would

incorporate live/work units minimising the impact on the road network. All services are available on site and access via existing driveway. The site was not identified in the extant Local Development Plan 2017 so does not represent an extension to sites identified in that Plan. The development would not impact upon the function of the Green Belt for the following reasons: Would not impact the identity of the city or the surrounding communities as it is small scale and concealed by tree boundaries. As development would be small scale and contained within the residential curtilage with clear defensible boundaries, it would not result in coalescence or sprawling development. The landscape setting of Aberdeen is not undermined by this proposal. Existing boundary treatments provide screening from the public road, giving privacy with little visual impact. The site would not affect access to open space. Ample open space in the area remaining.

Concerns raised about the process and the assessment of the site contained within the Main Issues Report. Disagrees that the site relates poorly to surrounding settlement or areas as it sits between three large housing development within 500 metres of the site, Friarsfield, Pinewood/Hazlehead and Countesswells. The site would have access to all amenities and facilities within the area, which can be access via Core Paths. Site is located close to an existing bus stop. Development would also be close to Airyhall given that the Pinewood development has pushed the settlement boundary further west towards this site. Airyhall and other services and facilities are a short distance from the site and can be reached via country lanes, core paths or public transport. Further services and public transport would be delivered by other development in close proximity to the site. Site is also suitable for cyclists. There has been too much focus on larger development sites in the area. Live/work units would also support home working and minimise the need to public transport or cars. The site is not isolated given its location and is well connected by Core Paths. Given the sites location adjacent to existing development the proposal is not sporadic and development will be hidden by existing landscaping and designed to blend into the setting and in keeping with other residential developments in the area, with no impact on visual appearance. The site offers a setting that would create a rural feel, which has accessible facilities and amenities nearby. Existing trees provide a natural boundary and screening and the design and layout of the site has sought to integrate trees into the development and there would be no loss of trees. Request that site is supported as a residential allocation as part of the Proposed Local Development Plan.

Bid Site B1001 - Former Dobbies Site, Hazledene Road

955: Previously submitted proposals for housing on site. Notes rejection of site in the Proposed Local Development Plan and Main Issues Report Site Assessments. Notes allocation of land adjacent at OP42 and planning permission for a hotel and equestrian centre which has similar designations to the site proposed and that development can be approved subject to planning conditions to safeguard and enhance ecological and environmental features of the site within a long term management regime. Alternative site has no controls. Notes planning permission for commercial uses on site (191143/DPP) however respondent is concerned this is unsustainable for the land and buildings which continue to deteriorate. Suggests conditions can be attached to planning permission for long term development solution to safeguard environmental assets on the site. Site condition will continue to deteriorate otherwise. Proposes a small enclave of development could be acceptable within the Green Belt to secure long term future of site and address environmental issues with no proposal to remove site from Green Belt or expand settlement boundary. Attached Ecological Constraints and Opportunities Plan concludes site would benefit from management of woodland and water features. Brownfield site that would benefit from redevelopment of low density housing or other sensitively developed

uses appropriate to the site. Site is not a conforming use within the Green Belt. Allocation ensures site upgrade and management for community benefit. Allocation of OP42 shows the Council recognises development can achieve such aims. Allocation would remove existing non-conforming uses and replace them with sustainable development within a managed woodland environment. Designation could identify a maximum number of residential units and suggests not being over 49 units if necessary with exact number determined by an ecological appraisal. Site performed well against other appraisal scoring parameters.

Bid Site B1003 - Land at Phase 1 North East Countesswells

46: Development would encourage expansion on towards Kingswells removing the green corridor.

833: Object to development proposal. General agreement with the Local Development Plan Team regarding developer proposals in the Community Council area within Ward 9 Deeside. Agree with exclusion of proposal from the Proposed Local Development Plan. Constraints: Green Belt, Green Space Network, impact on protected species, habitats, local designations, tress loss and post development impacts. The proposal is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing allocation targets. The proposal does not conform to Policy H3 density policy requirements. Site would remove valuable green space and risk coalescence between settlements. Site is currently Green Belt /Green Space Network and its development would result in loss of established trees which cover the site aside from existing path network. Site is exposed with north facing aspect and its development would have significant impact on landscape character due to topography and elevation. Proposal would have significant impact on nature conservation, loss/disturbance of wildlife habitat and species (including protected species). Proposal would sever Green Space Network and pose threats to natural designations within and surrounding the site. Limited range of facilities within 800 metres of the site. The site would be an extension to an existing Masterplan area. Post development impacts also noted.

717: Object to the failure to identify B1003 within the allocated boundary of OP38. Separate representations have been submitted on Housing Land Supply and Strategic Land Reserve. The site should be allocated for development in the first Plan period. The site has approved Planning Permission in Principle (Application Reference 140438) as part of the development at Countesswells. The development strategy which form part of the development bid for the site outlines the future growth of Countesswells through this site. The site comprises commercial woodland, partially felled for roads infrastructure. The remainder is to be felled at maturity. The site forms part of the adopted Development Framework. The principle of development on site has been established. Access to the site can be taken from the Jessiefield junction, with Countesswells providing services and facilities, and Jessiefield junction will provide a public transport corridor in due course. Work had commenced on all vehicle eastern access to Jessiefield. The site can deliver 350 new homes, landscaping and open space, with a housing mix and affordable homes. There are no physical or ecological constraints that would comprise development. Active travel links will be retained or created. The Green Belt designation is no longer relevant, as the sites lies within an adopted Development Framework boundary, with planning permission in principle and the commencement of an access road. The character of the Green Space Network has been altered due to the principle access, the site will provide a meaning full open space, and will offer the opportunity to provide a welcoming gateway to the new community on approach from the north. Landscape character has been modified

by the access road, woodland structured planning will enclose the sit and mitigate visual impact. Development would be well integrated into the Countesswells community, offering employment, retail, community facilities, schools and public transport links close to the site.

Bid Site B1004 - Jessiefield and Smithfield

686: Concerns regarding traffic impact on A944 and road infrastructure if site taken forward.

Bid Site B1005 - Bellfield Farm

686: Concerns regarding traffic impact on A944 and road infrastructure if site taken forward.

833: Object to development proposal. General agreement with the Local Development Plan Team regarding developer proposals in the Community Council area within Ward 9 Deeside. Supports the exclusion of proposal from the Proposed Local Development Plan. Constraints: Pylons, landscape fit, coalescence. Site is zoned as Green Belt which currently separates settlements and maintains landscape setting and separate identities. Coalescence. Important Green Belt function. Proposal would be highly visible and have significant impact on landscape due to topography. Sits on crest of rising ground. Proposal abuts site OP50 - reserved for future crematorium extension. Risk of conflicting land uses. Proposal abuts OP38 and would represent an extension to an existing Masterplan development. The proposal is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing allocation targets and does not conform to Policy H3 density policy requirement.

Modifications sought by those submitting representations:

Bid Site B0921 - Countesswells Expansion

46: Limit size of OP38 with no expansion allowed within the period of the Plan. Requirement to establish new shops and schools in Countesswells and Cults prior to any further expansion to either settlement. Clear protected zones between Countesswells and Cults and between Countesswells and Kingswells to stop urban spread to any of the three villages.

Bid Site B0921 - Site 2 Colthill

717: Allocate as a housing opportunity for up to 175 homes. Alternatively - identity it as Strategy Reserve Land.

Bid Site B0921 - Site 3

717: Allocate as a housing opportunity for 54 homes. Alternatively - identity it as Strategy Reserve Land.

Bid Site B0921 - Site 4, 5 and 6 Land at Mains of Countesswells

717: Allocate as housing opportunity. Site 4 can accommodate up to 75 homes; site 5 can accommodate 84 homes and site 6 can accommodate approximately 76 homes. Alternatively - identify as Strategy Reserve Land.

Bid Site B0921 - Site 7 Thornhill

717: Allocate as a housing opportunity for up to 100 homes. Alternatively - identify it as Strategy Reserve Land.

Bid Site B0925 - Highview House, Countesswells

190: Allocate for residential development in the Proposed Local Development Plan.

Bid Site B0932 - Hillhead of Countesswells

861: Allocate B0932 for three units.

Bid Site B1001 - Former Dobbies Site, Hazledene Road

955: Include as Opportunity Site within the Green Belt in Appendix 2. Text should state “a *Habitats Appraisal is required to accompany development proposals in order to avoid adverse effects on flora and fauna within the site and to provide a long term management plan*”, and “*the brownfield/previously developed area of the site is suitable for low density residential development or leisure/tourism use*”.

Bid Site B1003 - Land at Phase 1 North East Countesswells

717: Remove Green Belt and Green Space Network zoning. Allocate B1003 in the zoning of OP38: Countesswells, for approximately 350 homes.

Summary of responses (including reasons) by planning authority:

General Strategy

In preparing the Proposed Local Development Plan a Development Options Assessment (CDXX), Strategic Environmental Assessment (CDXX), and Main Issues Report (CDXX) were used to identify the most suitable locations to deliver the required growth. The majority of greenfield sites Opportunity Sites (OP sites) identified in the Proposed Local Development Plan have been carried over from the extant Local Development Plan 2017 (CDXX) which went through a similar site assessment process at that time. Most of these sites are at an advanced stage in terms of planning consents or Masterplans as detailed in the latest version of the Delivery Programme (CDXX). In the immediate locality, at Countesswells (OP38) construction is well under way.

The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) sets the requirements for greenfield housing and employment land allowances and these are set out in Table 3 and Table 4 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX), and is reflected within the Proposed Local Development Plan Spatial Strategy. Paragraph 4.18 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states “*new allocations should consider opportunities to reuse brownfield land and attempt to utilise the current “constrained” supply in the first instance. However; it is likely that some new development will need to take place on greenfield sites in order*

to help deliver the Vision and future strategy for growth...Allocations should be of a scale which would not inhibit the delivery of current strategic allocations and should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise". These is a requirement for at least 40% of all new housing in Aberdeen City to be on brownfield sites. Under Issue 2: Housing Land, we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan.

Bid Site B0904 - Land adjacent to Countesswells

833: Support for non-allocation of site B0904 is noted and welcomed. Site B0904 was not supported as an allocation and as such it is not identified as an Opportunity Site in the Proposed Local Development Plan. The merits of B0904 have been considered and rejected at the last Local Development Plan Examination as part of Issue 10: Alternative Sites - Countesswells (CDXX). Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells. The site is also remote from existing amenities, not served well by public transport and its residential only nature would not contribute to a greater mix of uses. No change is required.

Bid Site B0908 - Countesswells

833: Support for non-allocation of site B0908 is noted and welcomed. Site B0908 was not supported as an allocation and as such it is not identified as an Opportunity Site in the Proposed Local Development Plan. The merits of B0908 have been considered and rejected at the last Local Development Plan Examination as part of Issue 10: Alternative Sites - Countesswells (CDXX). Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells. The site is also remote from existing amenities, not served well by public transport and its environmental status as a Local Nature Conservation Site (Foggieton), Ancient Woodland, Green Belt and Green Space Network also make this site undesirable. No change is required.

Bid Site B0921 - Countesswells Expansion

46: Note concerns about lack of services and facilities and risk of increased car use. No expansion of the OP38 Countesswells allocation is promoted in the Proposed Local Development Plan.

686: Note concerns about impact on road network specifically the A944.

833: Support for non-allocation of B0921 is noted and welcomed.

46, 686, 833: Site B0921 was not supported as an allocation and as such it is not identified as an Opportunity Site in the Proposed Local Development Plan. The merits of B0921 have been considered and rejected at the last Local Development Plan

Examination as part of Issue 10: Alternative Sites Countesswells (CDXX). Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells. No change is required.

Bid Site B0921 - Site 2 Colthill

717: The merits of B0921 have been considered and rejected at the last Local Development Plan Examination as part of Issue 10: Alternative Sites - Countesswells (CDXX). There has been little significant change in circumstances over that period to warrant a different view now. Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells. The issue of Strategic Reserves was discussed within Issue 14: Our Communities – Additional Housing Allocations (CDXX) during the Examination of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The Reporter concluded that “*Scottish Planning Policy does not require the allocation of a “strategic reserve” but only an indication of the possible scale and location of future housing.*” The Reporter further concluded “*Although promoted by parties, I find that it would be unreasonable to require local development plans to include a strategic reserve*”. The Proposed Local Development Plan (see Section 3. The Spatial Strategy and specifically paragraph 3.13) does not identify Strategic Reserve Land for housing and therefore sites cannot be identified as such. This issue is further discussed in Issue 1 Vision, Spatial Strategy and Land Release Policy LR1. No change is required.

Bid Site B0921 - Countesswells Expansion Areas 2 and 7

356, 600: Support for non-allocation of B0921 is noted and welcomed. Site B0921 was not supported as an allocation and as such it is not identified as an opportunity site in the Proposed Local Development Plan. The merits of B0921 have been considered and rejected at the last Local Development Plan Examination as part of Issue 10: Alternative Sites - Countesswells (CDXX). Noting the General Strategy response above the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells. No change is required.

Bid Site B0921 - Site 3

46: Note concerns about pressure on adjacent woods and drainage.

46, 717: Bid Site B0921 was not supported as an allocation and as such it is not identified as an Opportunity Site in the Proposed Local Development Plan. The merits of B0921 have been considered and rejected at the last Local Development Plan Examination as part of Issue 10: Alternative Sites - Countesswells (CDXX). There has been little significant change in circumstances over that period to warrant a different view now. Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells. No change is required.

717: The issue of Strategic Reserves was discussed within Issue 14: Our Communities –

Additional Housing Allocations (CDXX) during the Examination of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The Reporter concluded that “*Scottish Planning Policy does not require the allocation of a “strategic reserve” but only an indication of the possible scale and location of future housing.*” The Reporter further concluded “*Although promoted by parties, I find that it would be unreasonable to require local development plans to include a strategic reserve*”. The Proposed Local Development Plan (see Section 3. The Spatial Strategy and specifically paragraph 3.13) does not identify Strategic Reserve Land for housing and therefore sites cannot be identified as such. This issue is further discussed in Issue 1 Vision, Spatial Strategy and Land Release Policy LR1. No change is required.

Bid Site B0921 - Site 4, 5 and 6 Land at Mains of Countesswells

46: Note concerns about loss of connecting corridor between the woods to North and South of the sites and a need for protection. Site B0921 was not supported as an allocation and as such the land remains zoned as Green Belt which offers the protection sought.

46, 717: Site B0921 was not supported as an allocation and as such it is not identified as an opportunity site in the Proposed Local Development Plan. The merits of B0921 have been considered and rejected at the last Local Development Plan Examination as part of Issue 10: Alternative Sites Countesswells (CDXX). There has been little significant change in circumstances over that period to warrant a different view now. Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells. No change is required.

717: The issue of Strategic Reserves was discussed within Issue 14: Our Communities – Additional Housing Allocations (CDXX) during the Examination of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The Reporter concluded that “*Scottish Planning Policy does not require the allocation of a “strategic reserve” but only an indication of the possible scale and location of future housing.*” The Reporter further concluded “*Although promoted by parties, I find that it would be unreasonable to require local development plans to include a strategic reserve*”. The Proposed Local Development Plan (see Section 3. The Spatial Strategy and specifically paragraph 3.13) does not identify Strategic Reserve Land for housing and therefore sites cannot be identified as such. This issue is further discussed in Issue 1: Vision, Spatial Strategy and Land Release Policy LR1. No change is required.

Bid Site B0921 - Site 7 Thornhill

46: Note concerns about proximity of site to OP41 and risk of coalescence.

46, 717: Site B0921 was not supported as an allocation and as such it is not identified as an Opportunity Site in the Proposed Local Development Plan. The merits of B0921 have been considered and rejected at the last Local Development Plan Examination as part of Issue 10: Alternative Sites - Countesswells (CDXX). There has been little significant change in circumstances over that period to warrant a different view now. Noting the General Strategy response above the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic

development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells. No change is required.

717: The issue of Strategic Reserves was discussed within Issue 14: Our Communities – Additional Housing Allocations (CDXX) during the Examination of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The Reporter concluded that “*Scottish Planning Policy does not require the allocation of a “strategic reserve” but only an indication of the possible scale and location of future housing.*” The Reporter further concluded “*Although promoted by parties, I find that it would be unreasonable to require local development plans to include a strategic reserve*”. The Proposed Local Development Plan (see Section 3. The Spatial Strategy and specifically paragraph 3.13) does not identify Strategic Reserve Land for housing and therefore sites cannot be identified as such. This issue is further discussed in Issue 1: Vision, Spatial Strategy and Land Release Policy LR1. No change is required.

Bid Site B0925 - Highview House

190: Noting the General Strategy response above under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Further the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) asked the Proposed Local Development Plan to focus the limited amount of housing land on brownfield sites and constrained supply in the first instance. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan. As stated in ‘Issue 7: Undesirable Sites South’ of the Response to Main Issues Report Representations (CDXX) development at the site is liable to erode the function of the Green Belt in protecting the setting and character of the City and its settlements preventing coalescence. It is not accessible by a range of transport options, would be car-dependent and amenities are not in close proximity. Allocation of the site is unlikely to accord with the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) as it does not require sites of this nature. The site is located within Green Belt and the Green Space Network adjacent to Ancient Woodland. It would represent an isolated development in the countryside with no relationship to any existing settlement. Whilst OP38 Countesswells will provide new services and facilities, these are not available now and the timescale for this provision relies on a stable build out rate. In any case the Bid Site and OP38 are not directly connected and would increase car dependency. Regarding land use mix, the Bid Site must be considered on its own merits and not attempt to share the provisions made by an adjacent land allocation. Regardless of any site specific issues which the respondent considers can be overcome, the fundamental lack of requirement for additional greenfield sites remains unchanged and as such allocation of the Bid Site is not required.

833: We agree that the site is undesirable and as such site B0925 was not supported as an allocation and is not identified as an Opportunity Site in the Proposed Local Development Plan.

Bid Site B0932 - Hillhead of Countesswells

833: We agree that the site is undesirable and as such site B0932 was not supported as an allocation and is not identified as an Opportunity Site in the Proposed Local Development Plan.

861: Noting the General Strategy response above under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Further the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) asked the Proposed Local Development Plan to focus the limited amount of housing land on brownfield sites and constrained supply in the first instance. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan. Allocation of the site is unlikely to accord with the Strategic Development Plan (CDXX) as it does not require sites of this nature. As stated in 'Issue 7: Undesirable Sites South' of the Response to Main Issues Report Representations (CDXX) the site is poorly related to the Cults settlement and western edge of the city, is not accessible or in reasonable proximity to local amenities. Development at this location would be sporadic and undermine the overall role of the Green Belt. Risk of loss to locally significant trees was noted in the Development Options Assessment (CDXX). Regarding provision of services and public transport the Bid Site must be considered on its own merits and not attempt to share the provisions made by an adjacent land allocation. Regardless of any site specific issues which the respondent considers can be overcome the fundamental lack of requirement for additional greenfield sites remains unchanged and as such allocation of the Bid Site is not required.

Bid Site B1001 - Former Dobbies Site, Hazledene Road

955: Noting the General Strategy response above under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Further the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) asked the Proposed Local Development Plan to focus the limited amount of housing land on brownfield sites and constrained supply in the first instance. The merits of development at B1001 were rejected at the two previous Local Development Plan Examinations (CDXX) and (CDXX) under Issue 36: Alternative Sites – Development in the Vicinity of Hazlehead Park of the Local Development Plan 2012 and Issue 8: Alternatives Sites – Kingswells and Greenferns of the extant Local Development Plan 2017. Notably within Issue 8 the Reporter concluded that the Green Belt status remained appropriate as it contributed to protecting the character, landscape setting and identity of the City. The site was considered to be distant from local services and employment opportunities. The Reporter noted that part of the site could be considered brownfield but that not all brownfield sites are suitable for redevelopment for different uses and on this site, as the site contributed to the function of the Green Belt, that development for non-Green Belt uses, such as housing, would be inappropriate. There has been no significant change in circumstances over that period to warrant a different view now.

955: As stated in 'Issue 7: Undesirable Sites South' of the Response to Main Issues Report Representations (CDXX) the site is located in the Green Belt and Green Space Network, the proposal would likely have a significant impact upon nature conservation resulting in loss/disturbance of wildlife habitat and species. Development at the bid site would sever the Green Space Network in this location and pose a threat to Ancient Woodland surrounding the site.

955: The upkeep and maintenance of land/buildings lies within the responsibility of the landowner and is not a matter for the Development Plan process. Residential development is not considered an appropriate land use in the Green Belt and as such it would not be competent to allocate a residential land allocation within a Green Belt zoned site contrary to the Natural Environment policies. Regardless of any site specific issues which the respondent considers can be overcome the fundamental lack of requirement for additional greenfield sites remains unchanged and as such allocation of the Bid Site is not required.

Bid Site B1003 - Land at Phase 1 North East Countesswells

46, 833, 717: The merits of development at B1003 have been rejected, and the boundaries of OP38 considered, at the last two Local Development Plan Examinations (CDXX) and (CDXX) under Issue 10: Alternative Sites - Countesswells of the extant Local Development Plan 2017 and Issue 33: Allocated Site – Countesswells OP58 of the Local Development Plan 2012. There has been little significant change in circumstances over that period to warrant a different view now. Noting the General Strategy response above, the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells. We would therefore agree with respondent 833 that the site remains undesirable and no change is required.

717: Noting the General Strategy response above under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Further it asked the Proposed Local Development Plan to focus the limited amount of housing land on brownfield sites and constrained supply in the first instance. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan. Allocation of the site is unlikely to accord with the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) as it does not support sites of this nature. As stated in 'Issue 7: Undesirable Sites South' of the Response to Main Issues Report Representations (CDXX) the site is Green Belt and Green Space Network, represents an extension to OP38 Countesswells and pose threats to wildlife habitats, natural designations, landscape character and the current allocation is not expected to be completed until post 2026. Whilst the Bid Site is within the boundary of an approved planning permission in principle (140438) the Committee Report (CDXX) clearly states "*The application boundary for the application extends to some 214.72 hectares to take into account provision of new roads connections to the A944 to the north. However, the physical areas for development of the dwelling and other built structures, would not extend beyond the allocated area within the Aberdeen Local Development Plan.*" Therefore the principle of development for residential purposes has not been established on the Bid Site land and extends only to that which is already allocated as OP38. The boundary of OP38 does not extend to include the Bid Site simply because a Planning Permission in Principle boundary is outlined on a site layout within The Development Framework and Phase 1 Masterplan Parts 1 and 2 (CDXX) and (CDXX). Parts 1 and 2 both contain site layouts which do not identify the Bid Site as a development area but as within the Planning Permission in Principle boundary. Thus this does also not affect the Green Belt or Green Space Network designations. The agreed boundary matches that which is identified in the extant Local Development Plan 2017 (CDXX) and the Proposed Local Development Plan carries this forward as there are no justified reasons for amending it.

Bid Site B1004 - Jessiefield and Smithfield

686: Note concerns about impact on road network specifically the A944. Site B1004 was not supported as an allocation and as such it is not identified as an Opportunity Site in the Proposed Local Development Plan. Noting the General Strategy response above, under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Further it asked the Proposed Local Development Plan to focus the limited amount of housing land on brownfield sites and constrained supply in the first instance. As stated in the Development Options Assessment (CDXX) the site is allocated OP50: Skene Road, Hazlehead and is reserved for a phased cemetery expansion and will be required for this. No change is required.

Bid Site B1005 - Bellfield Farm

686: Note concerns about impact on road network specifically the A944.

833: Support for non-allocation of B1005 is noted and welcomed.

686, 833: Site B1005 was not supported as an allocation and as such it is not identified as an Opportunity Site in the Proposed Local Development Plan. The merits of B1005 were previously considered and rejected by Aberdeen City Council during preparation of the Local Development Plan 2012. Noting the General Strategy response above, under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five-year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Further it asked the Proposed Local Development Plan to focus the limited amount of housing land on brownfield sites and constrained supply in the first instance. Finally the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not support extensions to existing, strategic development sites that have been subject to a masterplanning exercise as is the case at OP38 Countesswells which this Bid Site is located immediately adjacent to. As stated in the Development Options Assessment (CDXX) development of the Bid Site would have a significant impact on the landscape, it serves an important Green Belt function and provides separation between Countesswells and Kingswells to maintain their separate identities. No change is required.

Reporter's conclusions:

Reporter's recommendations:

Issue 11	ALLOCATED SITES AND GENERAL AREA STRATEGY: DEESIDE	
Development plan reference:	Page 23, Appendix 2, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mrs Kelly White (1) Gillian Williams (2) Ben Rumbles (3) Hamish Beedie (5) Gillian Vullings (6) Alan Austin (7) P.J.J. Vullings (8) Flora Austin (9) Richard Norris (10) Graeme Paterson (13) Monika and James Sajdyk and Robertson (14) Fraser Smith (15) Hugh Cameron (16) Pim Kuus (17) Sabine Freitag (19) James Cook (20) Laurence McMahon (29) Stephen Webber (32) David Clutterbuck (33) Laura Clutterbuck (36) Jill Sandilands (38) Albert Middler (41) Alison Middler (42) Laura McCance (58) Duncan McNeill (78) Mr and Mrs G. Ironside (86) Jim Sugden (90) Trevor Longstaff (92) Gemma Twigg (108) Andrew Bisset (109) Alan Bolton (125) Jamie and Nicola Buchan (149) Ann and Colin Milne (159) Mrs Lesley MacLennan (169) David Clark (177) Angela Bavidge (234) John Eagles (317) Samantha Wanigasuriya (431) Martin Kirkham (470) Joanne Jackson (473) John Gillespie (489) Jane Stirling (504) Robert Talbott (505)</p>		

Sandy Duncan (529)
Susan Chalmers (542)
Harry Chalmers (543)
Richard Nixon (545)
Avril Nixon (546)
Cameron Nixon (547)
Matthew Nixon (548)
Mary Duncan (551)
Graham Donaldson (558)
Hilary Leigh (576)
Stuart S. Walker (577)
Leiths (Scotland) Limited (580)
Alistair and Patti Lewis (585)
Julie Thain (592)
Fraser Scobbie (603)
Rashid Shahsavar (606)
Jane Hall (607)
Benjamin Seldon (611)
Douglas Harris (614)
Allan B Chalmers (625)
Ian Macilwain (627)
Gregor Forsyth (630)
Ian Porter (631)
Muir Urquhart (632)
Jane Swanson (652)
Dr Bruce Swanson (653)
Alex Ritchie (658)
Nigel Prichard (660)
Karen Barclay (661)
Kevin Bowden (662)
Donald Urquhart (671)
Lauren Horgan (673)
Jacqueline McGregor (674)
Kathryn Wade (690)
Lesley Stewart (698)
Stuart Jackson (700)
Brenda Noble (713)
Stewart Milne Homes (717)
Patti Lewis (718)
Katarina Rettie (749)
Jessica Hernandez Seiler (755)
Andy Roberts of Culter Community Council (764)
Catherine MacDonald (766)
Scott Family (769)
Iain MacDonald (774)
Peter Thain (778)
Stephen Webber (782)
Ms Trudie McIntosh (789)
Ms Rachel Woodd (794)
Elizabeth J Porter (808)
Mari Sterten (811)
Mrs Alexa Rennie (815)

Alistair Porter (820)
Denise Porter (821)
Jaclyn Moir (823)
Poppy Moir (824)
Sophie Thain (826)
Brigitte Matthews (827)
Mrs Hazel M Allanach (829)
Cults, Bieldside and Milltimber Community Council (833)
Prof Robin Matthews (838)
W and M Donald (844)
Robert Brew (853)
Cults Academy Parent Council (865)
Dr Aileen Grant (881)
NatureScot (888)
Bancon Homes (889)
Mrs Susan Jack (894)
NatureScot (896)
David Craib (899)
Mr Timothy Stringfellow (901)
Lamya Yousif (923)
David Reid (936)
Margaret Broadley (937)
Rachael Beedie (939)
Steven Lyons (947)
First Endeavour LLP (951)
Jacqueline Brawley (952)
Allan Chalmers (958)
Sarah Benzie (960)
Alexander Dougal Benzie (976)
Robert Cowie (1007)
Anna Inglis (1014)
Bruce and Gillin Purdon (1017)
Anna Salmon (1019)
Hannah Thain (1023)
Claire Geldof (1030)
Sheila Walker (1034)
Greg Walker (1037)
David Hays (1044)
Petra Vergunst (1055)
Mark Shields (1061)
Gary Watson (1068)
Ruth Watson (1070)
Stewart Petrie (1073)
Nir Oren (1077)
Janice Cooper (1106)
Callum Abbey (1111)
John Adam and Son (1114)
Vicki Halliburton (1128)
Mignon Manning (1154)
Iain Montgomery (1156)
Gordon Inglis (1163)
Carmenza Inglis (1168)

Daniel Verhamme (1169)
Ms Hana Karafiatova (1177)
Andy and Dorothy Marsden (1179)
Kevin Hutcheon (1184)
Robin Stringfellow (1194)
S Stringfellow (1195)

Provision of the development plan to which the issue relates:

Opportunity Sites in Deeside

Planning authority's summary of the representation(s):

Deeside General

1156: The respondents support Green Belt and green space policies and wishes to see them fully implemented along Deeside.

1017: The respondent states that there is sufficient existing housing supply considering the downturn in the economy.

690, 939: The respondents have concerns regarding the volume of development around Deeside and regarding loss of Green Belt. The respondents have outlined concerns regarding the capacity of infrastructure, schools and healthcare in Deeside and whether it will cope with further development.

Peterculter General

671: The respondent states that new mixed range housing is welcome and that the development will support local shops and school roll.

131, 132: The respondents support the Proposed Local Development Plan in not allocating Bid Site Milltimber South B0942 as it avoids visual, and amenity impacts which would otherwise occur. Further comments include support for the Proposed Local Development Plan in terms of not allocating sites Binghill Farm B0920 and Binghill House B0947 for development and designating them as green space instead.

1156: The respondent believes that Culter House Road should be renamed East and West to reflect the Aberdeen West Peripheral Route splitting it.

1, 13, 33, 36, 627, 662, 671, 674, 690, 749, 1007, 1111, 1156: The respondents have raised concerns that additional housing in Peterculter will result in a negative impact on local infrastructure which is currently insufficient. There are concerns regarding perceived impacts upon community facilities and services including schools and healthcare, traffic impact upon road infrastructure and pedestrian routes, and that the area is too peripheral and not conducive to accessing existing facilities and amenities. Further comments relate to concerns that additional housing in the area will impact upon wildlife and result in the loss of Green Belt and space used for amenity. Comments relate to the belief that Culter House Road will need to be upgraded including new walkways along to Croft House.

33, 125, 627, 674, 1007, 1111: The respondents state that there is sufficient existing housing supply and less demand due to the economic downturn and that there are numerous unsold properties in the area and that existing sites should be built out first.

125: The respondent believes that the allocation of a retirement community in Peterculter is appropriate and that this will fulfil some housing demand.

1156: The respondent supports the removal of OP114 from the Plan.

1007: Respondent believes there are issues of flytipping in the area and that streets are not being maintained in terms of cleaning and weeding.

1061: The respondent has concerns that the combined effect of OP51, OP52, OP53, OP54 and OP109 will fragment the Green Space Network, impact Local Nature Conservation Sites, result in loss of Ancient Woodland and affect protected species in addition to bringing about flooding impacts.

Milltimber General

431, 470, 1106, 1007, 1111, 1156: The respondents object to the loss of Green Belt and greenfield land around Milltimber and state that surrounding development will have overbearing impacts for existing residents, possible impacts upon natural beauty of the area and wildlife while fields being lost to development will give residents a feeling of claustrophobia and less freedom. Further comments state that development in the area will lead to climate change impacts and air pollution and that there may be impacts upon roads infrastructure, facilities and services. A respondent believes there are issues of flytipping in the area and that streets are not being maintained in terms of cleaning and weeding.

470, 660, 833, 1007, 1111: The respondents consider that current land allocations are adequate and there is no requirement for more housing at Milltimber and that existing sites should be built out first. Comments include the view that no major allocations are required. Concern that the allocations in Milltimber are not proportionate in scale in terms of numbers of proposed houses.

431: The respondent believes that there is no need for the Proposed Local Development Plan.

1156: The respondent disagrees with the statement that relatively limited development is proposed along the Deeside corridor with only one major site at Oldfold as developments proposed for Milltimber are major considering the size of this settlement.

Cults General

833, 1007, 1019: The respondents believe that there are too many houses being built in the area and that current land allocations are adequate and that there is a lack of demand for housing which is proven due to the fact that nearby new and old housing in Countesswells is not selling well and that the downturn in the oil and gas industries is affecting housing demand. Comments include the view that no major allocations are required.

1007, 1019: The respondents have concerns regarding the impact on the Green Belt, issues with school capacity, traffic and a lack of street cleaning. A respondent believes there are issues of flytipping in the area and that streets are not being maintained in terms of cleaning and weeding.

OP40: Cults Pumping Station

576: The respondent has no objection to seeing site redeveloped.

576, 833: The respondents object to site allocation.

Layout, Siting and Design and Spatial Strategy

576: The respondent seeks the incorporation of the pumping station's architectural features.

576, 833: The respondents seek the retention of allotments.

833: The respondent questions the practicality or economics of housing development on the site and seeks an alternative use such as civic amenity space centred around the heritage pumping station.

Transport, Roads and Access

576: The respondent states that public access between the allotments and Cults Burn should be retained.

OP41: Friarsfield

661, 937: The respondents object to the site allocation.

The Need For Housing

661: The respondent questions the demand for more housing as there are a number of homes already completed at the wider site and that large family homes have gone unpurchased on the market for some time and that affordable housing is required instead given the Council's pledge to provide it.

Infrastructure and Services

661, 937: The respondent stated concerns regarding the site allocation due to detrimental impact upon capacity of local schools and healthcare facilities and general infrastructure.

Transport, Roads and Access

661, 937: The respondents object to the site allocation due to the expected increase in traffic generation which will give rise to road safety issues. The speed limit should be lowered. The adequacy of existing road infrastructure to accommodate traffic is questioned. The speed limit should be lowered beginning and ending further along the roadway than at present to protect horseback riders and cyclists. Kirkbrae, North Deeside Road to Kingswells and Craigbank Drive in particular are deemed to be unsuitable for the anticipated traffic and unsafe as a result.

Natural Environment

661, 937: The respondents have raised concerns relating to potential impact from development upon local green space and woodland.

937 The respondent has concerns with regards possible impacts upon local wildlife.

OP43 - Milltimber Primary School

177, 558: The respondents are not against the principle of some sort of residential development at this site aside from highlighted concerns.

833: The respondent has no objections of inclusion of site allocation provided site is not fully built out.

92, 169, 137, 317, 606, 700, 833: The respondents object to the site allocation.

Process

92: The respondent believes that there was a failure to supply the neighbour notification to all neighbours within the statutory time period, that the notice stated 10 June, but the period began on the 20th of May. Furthermore, it is felt that the plan of the site provided was inadequate and devoid of useful detail. Respondent believes that there should be an ongoing database showing the representations to the site.

Layout, Siting and Design

92, 169, 177, 558, 606, 700, 833: The respondents have made specific comments relating to the desired scale and design of the proposed housing. Respondents are seeking single storey houses, smaller semidetached units and lower densities in order to preserve the character and amenity of the surrounding units. There are particular concerns over the scale of allocation considering topography constraints of the site, that 18-20 units is the limit and that there is the potential for overcrowding. Housing types should be in keeping with the area. It is noted by a respondent that Monearn Gardens has 37 properties on 2.3 hectares. A respondent seeks the inclusion of allotments and common spaces.

606: The respondent commented on loss of view.

Infrastructure and Services

317, 700, 833: The respondents object to the site allocation due to detrimental impact upon local facilities in general and note that ongoing development in Milltimber has already restricted availability of local amenities. The respondents have concerns regarding drainage capacity and flooding arising from the proposed development, particularly the eastern edge of the site being flood prone.

Transport, Roads and Access

177, 558, 700: The respondents raised concern about access to the development, that surrounding road infrastructure is too narrow to accommodate further traffic. Comments include concern regarding third party land ownership constraints, that the east side of the

site is restricted to a narrow strip for pedestrian access and residents of Binghill Crescent own the land to either side of the access. Concerns about safety and amenity due to increase traffic movement on a narrow road and upgrade required, particularly to elderly residents on Monearn Gardens.

169, 588: The respondents commented that access will be via Monearn Gardens which is in poor repair which construction vehicles will worsen so it will require resurfacing and that the resurfacing of existing pavements should be conditioned in the event of planning approval.

169, 558: The respondents state their opinion that certain walkways should be retained as a right of way, in particular the way from Monearn Gardens to the North Deeside Road and the right of way to the east of the site.

Natural Environment

92, 169, 317, 558, 606, 833: The respondents have concerns regarding potential loss of green community space and a greenfield site. The area is deemed to be lacking in available open space at present and site is well used for sport and exercise. Respondents also seek retention of mature trees and some green areas within the site, particularly as these trees secure privacy at present and it is noted that a tree survey is required as set out in the Proposed Local Development Plan.

Miscellaneous Comments

700: The respondent stated concerns regarding construction noise, construction traffic and ensuring a secure construction site.

92: The respondent believes that there is a mapping error and that the boundary shown on neighbour notification extends beyond Aberdeen City Council owned land.

OP44 - North Lasts Quarry

580: The respondent states that zoning will safeguard the site for mineral extraction in line with approved planning permission 161687/DPP and is compliant with paragraph 238 of Scottish Planning Policy on ensuring at least 10 year permitted reserve, and the consent runs until 30 April 2047.

580: The respondent considers that a local quarry will support short transport distances of material to sites and support the economy.

OP47 - Edgehill

833, 1156: The respondents object to the site allocation.

833: The respondent notes the incorrect naming of Edgehill Road which is elsewhere in Aberdeen.

833: The respondent queries why this site remains in the Proposed Local Development Plan when the site is almost complete with no scope for further development without demolishing/redeveloping existing three houses at north of the site.

1156: The respondent questions the suitability of footpaths along Culter House Road up to Croft House to serve the site allocation.

OP48 - Oldford

58, 470, 1017: The respondents object to the site allocation.

58: The respondent objects due to potential noise impacts from construction, stone cutting specifically. When respondent was pregnant this prevented sleep.

1017: The respondent believes that half of the allocation should be returned as Green Belt designation.

OP50 - Skene Road Hazlehead

78: The respondent does not support site allocation and the encirclement of the Den of Madencraig and the resultant narrow fragmented corridor of habitat which would be cut off from surrounding habitat and affect wildlife such as badgers, deer and foxes. The respondents seeks removal of the development opportunities encircling the Local Nature Reserve.

OP51 - Peterculter Burn

764: The respondent believes this site to be less contentious than Tillyoch and if it is built out at the required density to meet existing Policy H3 it would provide Culter with a comfortable degree of expansion, making Tillyoch unnecessary.

1, 109, 627, 952, 1017, 1061: The respondents object to site allocation.

More Suitable Alternatives

1061: The respondent states that there are more suitable alternative sites or options for housing in the form of brownfield opportunities.

Layout, Siting and Design

627, 952: The respondent objects and considers that allocation will alter the character of the existing village and introduce a suburban character. Concern has been raised that this will result in ribbon development along Malcolm Road. The respondent considers that a smaller mix of affordable and private housing is needed in the area. The respondent does not wish to see 'executive style' houses which are not needed in the settlement.

Infrastructure and Services

627, 952, 1061: The respondent objects to the site allocation due to detrimental impact upon facilities in general and the capacity of local schools, in particular the primary school and nursery which rely on temporary buildings in order to accommodate numbers and the secondary school which is forecast to exceed capacity by 2021. The respondents object to the site allocation due to detrimental impact upon healthcare and dental facilities. The respondents object to the site allocation due to perceived detrimental impacts upon the capacity of local sewers, which are at capacity already, and concern that this could give rise to flooding impacts. In particular where OP51 and OP52 connect with Malcolm Road

is considered to be an area of high risk flooding going by SEPA flood risk maps. Combined effect of OP51, OP52, OP53 and OP109 on flooding.

Traffic and Road Safety

627, 1061: The respondents object to the site allocation due to the expected increase in traffic generation and the adequacy of existing road infrastructure to accommodate traffic which will potentially give rise to road safety issues and parking congestion. Comments include disappointment that Malcolm Road has seen a reduction in traffic due to the formation of the Aberdeen West Peripheral Route but that the proposed developments will see this rise and become less suitable for pedestrians and cyclists. There are also particular stated concerns that there would be increased traffic at the narrowest point of Malcolm Road just before the junction with Bucklerburn Road where it is not safe for large vehicles to pass one another. Further comment includes concern that the junction for OP51 and OP52 has poor visibility.

952: The respondent understands that waste collection can only be accessed via Cornyhaugh Road which is an unadopted lane. Concerned whether lane could support an increased volume of traffic.

1061: The respondent questions the adequacy of footpaths. In particular the suitability of the footpaths along Malcolm Road to serve the site allocation are questioned. It is considered that there is a risk to pedestrians using the footway of Malcolm Road in the event that the bus route is extended to the site given how narrow the road is for large passing traffic.

Sustainability

1061: The site is remote from the shops and amenities of Peterculter.

Green Belt

627, 1017, 1061: The respondents object to the site allocation and do not wish to see loss of Green Belt and that there are too many developments on Green Belt.

Natural Environment

1, 952, 1061: The respondents raised concerns relating to potential impact from development upon landscape, local green space, green network, conservation sites, recreational open space and or Ancient Woodland. Specific comments relate to concerns that insufficient assessment of habitat within the site has taken place. Green space which is accessible by walking for elderly residents will be lost.

1, 627, 952, 1061: The respondents raised concerns relating to impact upon local wildlife and protected species. A respondent has raised concerns that Salmon access waters in an around the proposed development following the installation of a fish ladder on the dam downstream and there are consequently potential effects upon the River Dee Special Area of Conservation.

1, 952: The respondents state that the site was a old tip and chemical dump therefore is not suitable for development, that further assessment of the tip is required prior to development.

OP52 - Malcolm Road

109, 627, 718, 1017, 1061: The respondents object to the site allocation.

More Suitable Alternatives

1061: The respondent states that there are more suitable alternative sites or options for housing in the form of brownfield opportunities.

Layout, Siting and Design

627, 718: The respondents object that the allocation will alter the character of the existing village and landscape character and introduce a suburban character or affect the Conservation Area.

718: The respondent believes that there is a risk of vandalism, noise, more pollution and peaceful community being destroyed.

Infrastructure and Services

627, 718, 1061: The respondents object to the site allocation due to detrimental impact upon facilities in general and the capacity of local schools. The respondents object to the site allocation due to detrimental impact upon healthcare and dental facilities. The respondents object to the site allocation due to detrimental impact upon capacity of local sewers and could give rise to flooding impacts. Combined effect of OP51, OP52, OP53 and OP109 on flooding.

Traffic and Road Safety

627, 718, 1061: The respondents object to the site allocation due to the expected increase in traffic generation which will give rise to road safety or other implications and the adequacy of existing road infrastructure to accommodate traffic. Specific comment includes concern that the junction between Malcolm Road and North Deeside junction has poor sightlines and that there is no parking in Peterculter.

1061: The respondent questions the suitability of walkways to serve the site.

Green Belt

627, 1017, 1061: The respondents object to the site allocation and rezoning from Green Belt.

Natural Environment

1061: The respondent has concerns relating to potential impact from development upon landscape, local green space, green network, conservation sites and Ancient Woodland, in particular encroachment upon woodland from widening access to site.

627, 718, 1061: The respondents object to the perceived likely impacts upon local wildlife. Specific comments relates to concerns that insufficient habitat assessment of the sites has taken place.

Miscellaneous

1061: The respondent commented that the ground works appear to have commenced.

OP53 - Tillyoch

Support for the Allocation

951: Supports the allocation. Community requested more housing during consultation. The site has good access and connections to local facilities and the local bus service will be extended to site. The proposal for mixed community site will address housing shortage and the Scottish Government concerns on the sustainability of town centres and it will satisfy the Council and Scottish Government's housing objectives. The development will provide a range of house types and sizes, open green space, walking routes and community woodland. There is sufficient capacity at Culter Primary School and there are opportunities to create additional capacity at Cults Academy. The site is viable, the landowner is willing to proceed and there are no constraints. The Proposed Local Development Plan recognises the need to satisfy housing demand and allocate accordingly.

1128: Supports housing in this area for social, affordable and key worker homes. There is a strong need for these types of homes for local families and workers. This needs to be tightly control so that the developer cannot reduce the percentage of such housing to make more money from larger market homes. Urge that the plans include well-integrated areas of green space, allotment areas, cycle and footpaths as well as protected wildlife areas. The Ancient Woodland should be preserved as much as possible, plus tree planting on the outskirts and in among the housing, to create corridors and shelter for wildlife. Culter Primary School and Nursery will be able to provide education. There will be a requirement to extend the bus route and possible a new health centre.

1156: The respondent believes that the site should be Masterplanned alongside OP54 to better serve the nature of what is a standalone community.

Objections to Development

1, 2, 3, 5, 6, 7, 8, 9, 10, 14, 15, 16, 17, 19, 20, 29, 32, 41, 42, 90, 108, 125, 149, 159, 234, 542, 543, 545, 546, 547, 548, 577, 607, 611, 614, 625, 627, 630, 631, 652, 653, 658, 673, 698, 713, 717, 749, 755, 764, 789, 794, 808, 811, 827, 838, 844, 853, 865, 881, 889, 894, 899, 901, 923, 936, 947, 960, 976, 1044, 1055, 1156, 1061, 1073, 1077, 1154, 1163, 1168, 1169, 1179, 1184, 1194, 1195: The respondents object to the site allocation.

The Need For Housing

29, 42, 542, 543, 545, 546, 547, 548, 614, 630, 632, 698, 755, 789, 794, 827, 838, 853, 881, 894, 901, 947, 960, 976, 1077, 1163, 1169, 1194, 1195: Question the demand for more housing in the area. There is sufficient housing stock, other allocated sites have not been developed and the extant Local Development Plan 2017 has adequate land to meet housing demand, as is identified in the Aberdeen City and Shire Housing Land Audit 2018. Due to the current decline in the economic climate the relevance of the Aberdeen City and Shire Strategic Development Plan figures are questioned. The housing market in Aberdeen has slowed, there are a number of vacant units within the City, and with the

preference to develop brownfield sites the need to develop Green Belt is questioned. Allocating further land will result in more empty homes. Given the cost, the majority of properties would be bought by people unrelated to current resident families and will be commuters to the City. The pressure to create homes in the Region is appreciated, but homes are not required in the area. The Brownfield Report is inadequate and should consider the 2000 empty homes already in Aberdeen or any of the industrial zone sites many of which are under-occupied and could be converted to housing developments. The retirement village has been successful and positive.

More Suitable Alternatives

29, 755, 881, 976: There are more suitable alternative sites or options for housing. These include: South Station Road; west side of Malcolm Road to the north of the football ground; fields opposite Albyn School playing fields. There are other allocated sites that have not been developed yet. Area has several undeveloped sites and existing brownfield sites with better access to amenities should be redeveloped. Money should be spent on City Centre rejuvenation instead of proposal. Sites with active travel should be supported instead.

853: The respondent states that a much smaller development at Tillyoch (for 60 houses) for those with connections to Peterculter would be more palatable, although the details and impact would have to be considered.

Reports/Object to Procedure to Allocate Site

6, 8, 19, 20, 32, 41, 90, 108, 542, 543, 545, 546, 547, 548, 611, 625, 631, 698, 717, 764, 789, 794, 808, 838, 853, 865, 881, 888, 896, 899, 901, 947, 960, 976, 1061, 1156, 1169, 1194, 1195: The site has been allocated despite being deemed to be 'undesirable' through the Pre-Main Issues and Main Issues Report Development Options Assessment. Concerns raised in relation to adequacy or transparency of consultation/engagement process and that there was a lack of evaluation and justification for the allocation. Comments include concern with regard the late nature of allocation in response to Reporter's demand for increased housing capacity, that the last minute nature of the decision was bad for democracy, no evidence was presented at Committee in making the decision. The allocation needs to be removed for further consideration as a late amendment. A respondent commented that similar sites in Peterculter in previous Proposed Local Development Plans have been removed by Reporters due to tree coverage and local of sustainability. The developer refers to site as brownfield in Main Issues Report which indicates that decision had already been made to allocate.

881: Culter Community Council and Aberdeen City Council are not seeking housing.

7, 9, 717, 853, 1061, 1169: It is highlighted that the site does not score well against the Sustainability Checklist used in the Development Options Assessment Report and including it as an OP site contradicts the criteria. A respondent also noted the Council's assessment that the development would give rise to soil compaction and erosion. Issues with regards availability of Strategic Environmental Assessment information have been highlighted, firstly that the development bid is not available and therefore it is not possible to assess whether an appropriate assessment has been carried out given the conservation issues and loss of near urban green space, secondly that issues identified in the Strategic Environmental Assessment are not picked up in Table 3 of the Proposed Local Development Plan on page 23. Table 3 incorrectly states that there are no issues

which is in contrast to the supporting documentation which highlights a number of issues in the Strategic Environmental Assessment for the site.

Planning Application

545, 546, 547, 548, 901, 1194, 1195: Comments relating to the Proposal of Application Notice process and noted disquiet due to the timing of the event, and insufficient advertisement and consultation process and a strong divergence of public opinion.

717: Concerns were raised by a respondent in relation to site contamination.

717: The viability of the proposed allocation is questioned by the respondent and the effectiveness against Planning Advice Note 2/2010: Affordable Housing and Land Audits is called into question as the developer is not the landowner, there are unassessed site constraints and the site not marketed due to remoteness, there is no confirmation of public funding for affordable housing and the site is not part of Aberdeen City Council's Strategic Housing Investment Plan.

17, 32, 41, 90, 755, 794, 808, 853, 881, 901: Raise concerns regarding the effect that the allocation would have upon the adjacent equestrian facility/pet resort which was funded 10 years ago at some expense and its loss is considered to be a waste of public money.

General Area Strategy

577, 827, 844: Development of site only occurred due to compulsory purchase of the previously located business. The existing businesses (equine and cattery) have been used to justify housing in the Green Belt. The only brownfield element of the site is the Pet Resort.

6, 8, 125, 853: Believe that major developments within Aberdeen should remain within the boundary of the Aberdeen West Peripheral Route. Further comment that the Aberdeen West Peripheral Route was developed on the understanding that it was not to become a development corridor or have further junctions which the proposed allocation goes against.

1: If development in Peterculter does occur this site is preferred over OP51, and OP54 as its proximity to the Aberdeen Western Peripheral Route will allow residents to access medical and community facilities outwith Peterculter.

19, 625, 853, 894, 923, 1169: Object to the scale of the proposed site allocation and consider it too great and disproportionate to the existing settlement. The allocation housing numbers are greater than the combined total of all other allocated housing sites in the area. A respondent states that the inclusion of woodland within the site raises the density of the developable land to a level which is not appropriate for rural location. Smaller allocation of 60 houses more appropriate.

889: Believes that the site has been allocated instead of OP114 which is an undesirable decision.

625, 631, 827, 838, 853: Core Path 52 - Shoddy toward Culter House forms a natural boundary to Peterculter and that the allocation would result in urban sprawl/ cut off access to the countryside. This path was defined by Reporter in 2014 as northern boundary.

20: The respondent raised concern that OP53 has been allocated at the expense of the residents of Peterculter as allocation OP114 was removed.

Layout, Siting and Design

17, 542, 543, 545, 625, 627, 631, 653, 713, 794, 808, 811, 827, 838, 853, 901, 947, 1179: Object that allocation will alter the character of the existing village/landscape impact and that development has the potential to introduce a suburban/urban character. The site itself has landscape value and existing houses in area are sporadic and in rural setting. The site is detached from the main settlement of Peterculter and is not a natural extension of settlement and unrelated to local context. The area is classed as Wooded Estates which has strong rural character. The allocation will lead to ribbon development along Malcolm Road, will detract from the surrounding when viewed from A93 travelling west towards Peterculter and there will be visual impacts from North Deeside Road. Road infrastructure will lead to the isolation of residents from Peterculter and would result in woodland loss.

631, 808: Concern regarding topography of the site, that the steep gradient makes walking or cycling difficult and therefore less likely to take place.

717, 794: The respondents consider that there is a lack of housing mix, that 100% affordable homes are not desirable.

29, 607: The disruption and wider impacts are not worth it. It is queried how site is suitable for housing but not suitable for kennels.

Infrastructure and Services

2, 3, 5, 6, 15, 16, 17, 19, 20, 32, 41, 90, 125, 149, 159, 542, 543, 611, 614, 625, 631, 632, 652, 653, 658, 698, 713, 717, 749, 789, 794, 808, 827, 838, 844, 853, 865, 881, 894, 899, 901, 923, 936, 960, 976, 1044, 1061, 1128, 1163, 1168, 1169, 1179, 1184, 1194, 1195: There are potential detrimental impacts upon local infrastructure and services in general. Concerns regarding the capacity of local primary and secondary schools and their ability to accommodate further pupils, be this through extensions to the building or timetabling. The proposed development will put pressure on health services and concerns regarding the capacity of healthcare facilities and dental surgeries, including the ability to recruit caregivers in primary positions while doctors are also struggling to cope with demand. There are existing flooding impacts in the area. Local sewers have limited capacity and the site could give rise to further flooding impacts. The sewer at Malcolm Road is of particular concern. Development on the Bucklerburn drainage basin will result in flooding. There are concerns that the combined effect of OP51, OP52, OP53 and OP109 will cause flooding. Investment in flood prevention infrastructure would be required. The site is above the level of the reservoir at Ardbeck, and there may be disruption to the mains water supply. There is a lack of employment opportunities in the village and investment in community facilities is required to accommodate development needs. A new Peterculter Retirement Park is required. The internet connection is poor and extra homes would put additional pressure on bandwidth.

789: Believes that local Primary School has capacity to serve development.

Transport, Roads and Access

2, 3, 6, 7, 9, 15, 17, 19, 20, 90, 125, 149, 159, 607, 625, 627, 630, 631, 652, 658, 713, 717, 749, 755, 789, 794, 808, 827, 838, 844, 853, 894, 923, 976, 1061, 1073, 1077, 1154, 1163, 1168, 1179, 1184, 1194, 1195: Object to the site allocation as they anticipate an increase in traffic generation which would give rise to road safety, parking and other implications, including speeding traffic and safety issues. The adequacy and capacity of existing road infrastructure to safely accommodate the additional traffic is questioned. The potential to serve the site with a safe vehicular access is questioned, particularly if it is via School Road or Coronation Road which should not be permitted on safety grounds due to traffic issues or Culter House Road which in the respondent's view is not wide enough for pedestrians or passing trucks which presently mount pavements causing damage to gas and water pipework. There are required upgrades to existing surrounding road infrastructure. Pedestrians need to currently cross Malcolm Road to get to village which is unsafe. Comments include concern that home matches for Culter FC already lead to parking overspill issues on Malcolm Road and Coryhaugh Road, that there is potential for traffic around Bucklerburn Drive/School Road and that the development would lead to traffic on North Deeside Road. Specific comments relate to traffic from development causing issue at the Culter House Road slip road onto Aberdeen West Peripheral Route and the requirement for traffic surveys and traffic lights for peak periods and concern that site has no access to Culter Village other than via B979, and that the Aberdeen West Peripheral Route should be protected from further traffic entering from the west which the respondents understand is Council policy, in particular that development to the west of the Aberdeen Western Peripheral Route is discouraged for the first 3 years after its opening. Further comments were received that state the opinion that since Aberdeen West Peripheral Route opened increased usage of Malcolm Road has occurred and this should be surveyed to assess suitability of access. A comment says that the pandemic will further encourage private car use instead of public transport leading to further traffic problems.

2, 90, 542, 543, 611, 631, 653, 827, 838, 853, 881, 894, 901, 923, 960, 1077, 1128, 1194, 1195: There are insufficient existing public transport options to serve the site allocation and the development site would affect public transport.

7, 9, 17, 20, 32, 625, 631, 713, 794, 808, 827, 838, 853, 894, 923, 1061, 1163, 1168: Impact of the development on nearby core paths, potential new paths and the suitability of existing core paths and routes. The allocation may lead to more frequent interaction of pedestrians and vehicles which may lead to safety issues. The allocation will prevent Culter House Road from becoming a core path which is at odds with policy T5 and NE2. Existing paths may not be able to be extended / widened due to ownership issues and TPOs, and poor maintenance of existing paths and rights of way not encourage their use.

1077: The respondent stated that any development should have active travel at its heart rather than added as an afterthought.

Sustainability

7, 9, 16, 17, 29, 32, 41, 42, 90, 542, 543, 611, 614, 625, 630, 631, 632, 652, 653, 717, 755, 789, 808, 827, 838, 844, 853, 881, 901, 923, 960, 976, 1077, 1163, 1168, 1184, 1194, 1195: The site is remote and outwith walkable distance (400 metres) from local employment and other services and amenities including sports and recreation space, schools, medical centres, community facilities, shops and services. This would result in

increased car usage which would need to use the road adjacent to the Aberdeen West Peripheral Route, or residents will more likely to visit Westhill which has more to offer.

29, 717, 853, 901, 976, 1163, 1168: The site is too remote to be suited to development of social/affordable housing. Low-cost housing should be integrated with bus stops, services, health centre or close proximity to city centre where people can walk/cycle. There has been no confirmation of public funding for affordable housing and the site is not part of Aberdeen City Council's Strategic Housing Investment Plan. Queries whether the requirement for 25% affordable units would actually be delivered on these sites.

125,1077: There will be significant CO2 emissions. Even with proposed measures impacts cannot be removed. Loss of woodland from development would result in loss of stored carbon. Development goes against national climate change objectives. The introduction of electric vehicles is not sufficient to mitigate these impacts. The pandemic has resulted in a reduction in public transport usage which will increase dependence upon private cars.

827, 838, 1179: Concerned about increased pollution from traffic.

808: Comment made in relation to a lack of a trade deal and the subsequent anticipated food shortages and the need for low food miles and food security.

Green Belt

2, 6, 19, 20, 29, 542, 543, 545, 546, 547, 548, 577, 607, 611, 627, 630, 631, 652, 653, 658, 698, 749, 789, 794, 808, 811, 827, 838, 853, 881, 899, 901, 923, 947, 960, 976, 1061, 1077, 1154, 1177, 1184: Objects to the rezoning from Green Belt /greenfield. There are too many recent developments and proposed allocations encroaching on local Green Belt. Allocation would cut physical connectivity with adjoining open spaces. Green Belt spaces are limited and that Culter Green Belt has recreational function.

Natural Environment

2, 3, 7, 16, 17, 19, 20, 29, 32, 41, 42, 90, 108, 109, 125, 149, 159, 542, 543, 545, 546, 547, 548, 611, 614, 625, 627, 630, 631, 632,652, 653, 673, 698, 713, 717, 749, 755, 789, 808, 811, 827, 838, 844, 853, 881, 894, 899, 901, 923, 936, 960, 1014, 1017, 1044, 1055, 1061, 1154, 1163, 1168, 1169, 1177, 1179, 1184, 1194, 1195: Concerns relating to potential impact or loss from development upon local green space, green network, wetland, farmland, landscape character, conservation sites, recreational open space and Ancient Woodland and believe that these areas should be safeguarded and that such natural environments which are scarce around Peterculter have benefits to human health, including mental health, and community benefits. There is concern that encroachment upon the protected woodland belt, including impact upon tree canopies, lichen and microsystems will occur from the required widening of Culter House Road or forming access to the site off Culter House Road; the woodland is diverse and cannot be replaced. Respondents have highlighted that there are Tree Preservation Orders within the site, including specific reference to Tree Preservation Order no. 210, and the perception that the site should be restored since a number of trees were illegally felled in relation to a previous sought development which included a planning application. The wooded corridors such as between Ardback Hill over core path 52 to surrounding woodland should be protected. Objectors have outlined their feeling that there are combined effects upon availability of green space from proposed sites OP51, OP52, OP53 and OP109.

2, 3, 7, 9, 16,17, 19, 20, 29, 32, 41, 90, 149, 159, 542, 543, 545, 546, 547, 548, 611, 627, 631, 632, 673, 698, 713, 808, 811, 827, 838, 844, 853, 881, 894, 901, 936, 960, 976, 1055, 1061, 1154, 1163, 1168, 1179, 1184, 1194, 1195: Impact upon local wildlife and protected species, the site is of high ecological importance and there would be impact upon biodiversity due to loss of habitat, including native species, wetland specific species. There are two Ancient Woodlands which could be affected and that wildlife moves through these areas. There is protected wildlife to the south of the site which could be affected and there is a risk to species due to increased traffic. Concern over the combined effects of proposed sites OP51, OP52, OP53 and OP109 upon wildlife. There could be an impact from development on the River Dee as a resource and wildlife habitat due to pollution.

888, 896: Advise excluding the woodland area to the southeast from the site and also providing information demonstrating how the woodland would be protected. The creation of wildlife corridors through the site would help connect existing woodland parcels. The Strategic Environmental Assessment notes that: "Development will change the character of the landscape. This could be managed by careful design and landscaping." While careful design and landscaping may be helpful to a degree, the northern square of land in the site allocation encroaches on to the upper slopes of the hill, removing the northern part of the site from within the allocation boundary will give more protection.

888, 896: The respondent notes that a significant proportion of the site is designated as Green Space Network, Peterculter Local Nature Conservation Site, Ancient Woodland and trees with protection orders. Respondent advises excluding the wooded area from the site and a requirement for developers to demonstrate how woodland would be protected as well as the requirement for the creation of wildlife corridors through the site to connect existing woodland parcels.

Policy Implications

125, 808, 853: The loss of green infrastructure is at odds with Scottish Planning Policy. The site does not meet the criteria of Scottish Planning Policy in terms of the choice of site which has natural conservation and beauty. Scottish Planning Policy 2014 sections 6.6 and 6.7 state that green infrastructure should be enhanced in and around cities.

653, 844, 901, 853, 901, 923, 960, 1061: The site does not comply with aims or aspirations of the Proposed Local Development Plan and or a number of policies including NE1, NE2, D4, WB1, D1, T2, H2, B1 and D5.

Miscellaneous Comments

853: Rental units would be bad for the local community as it would introduce transient people into a settled community.

717: The site is constrained by presence of pylons.

630, 1184: Potential dust and noise impacts will arise from construction.

OP54 - Craigton

1, 19, 20, 32, 33, 36, 41, 109, 585, 592, 603, 627, 698, 717, 718, 764, 766, 774, 778, 782, 794, 698, 808, 815, 820, 821, 823, 824, 826, 827, 829, 844, 888, 894, 896, 947, 958, 1023, 1030, 1034, 1037, 1061, 1068, 1070: The respondents object to site allocation or recommend its removal.

769: Supports the inclusion of OP54 Craigton.

1156: The site should be masterplanned alongside OP53 to better serve the nature of what is a standalone community.

The Need for Housing

33, 36, 42, 585, 766, 778, 782, 820, 821, 823, 827, 894: Question the demand for more housing, that it goes against Government economic forecasts given changes in energy focus away from oil and gas, current allocations meet the demands of the Aberdeen City and Shire Strategic Development Plan and because there is no justification within the Aberdeen City and Shire Housing Land Audit 2018 to allocate further sites given that it indicates adequate land supply for housing in the city, there is no demand around Peterculter and existing allocations have not yet been built out and that there are already vacant homes in the area. Ongoing pandemic is affecting local economy and demand and it will further reduce demand for housing as shopping habits change and working from home becomes normal. The market has slowed and nearby houses at Pittengullies have sold very slowly.

More Suitable Alternatives

41, 585: The respondents state that there are more suitable alternative sites for housing sites such as brownfield opportunities. Specific comment relates to Countesswells as being more suitable for affordable housing and that the current site is not suitable for affordable housing.

Reports/Object to Procedure to Allocate Site

19, 20, 32, 592, 603, 717, 766, 778, 782, 808, 815, 820, 829, 947, 1034, 1061, 1156: The site has been allocated despite being deemed to be 'undesirable' through the Pre-Main Issues and Main Issues Report Development Options Assessment. The site was previously rejected by a Reporter (c. 2004) due to access concerns at Malcolm Road. Many site constraints render site as unsuitable. Object to procedures used to allocate the site and have concerns that the Council has gone back on its previously considered decision. The site was introduced as amendment at Full Council meeting 2 March and the limited period to comment from 25 May to 17 July. There was no explanation for the change of decision to allocate the site and no evidence was presented at Committee on rezoning. The notification of the proposed allocation in the Culter Courier was insufficient and there has been insufficient engagement with the local community. Comments include reference to consultation event on the 10 of February which was contradictory.

782, 1061: Lack of assessment of climate change and environmental analysis, no analysis of risks and impact on Peterculter community. Issues identified in the Strategic Environmental Assessment are not picked up in Table 3 of the Proposed Local Development Plan on page 23. Table 3 incorrectly states that there are no issues which is in contrast to the supporting documentation which highlights a number of issues in the Strategic Environmental Assessment for the site.

808: Comment on a previous decision by the Reporter regarding the boundary line of the village, being The Shoddy Road.

General Area Strategy

20, 820, 823: OP54 has been allocated at the expense of the residents of Peterculter as allocation OP114 was removed. Allocation would not benefit the local community. Concern that housing would not meet needs of existing community and instead be intended for those outwith the settlement.

717: The respondent believes that the site allocation should be removed and replaced with BID Ref 09/28.

Layout, Siting and Design

603, 627, 717, 718, 766, 778, 794, 808, 815, 820, 821, 823, 826, 829, 844, 888, 896 958, 1023, 1034, 1068: Raise concerns with regards the visual sensitivity of the location of the site and surroundings especially given the topography of the site giving rise to wider visual impact and overlooking existing residences. Any development would be highly visible from the A93 and that there would be negative landscape impacts from the surrounding road network. The proposed allocation will alter the character of the existing village by introducing a suburban character to an area of more sporadic development which would affect the Conservation Area and also further concerns that the site has a lack of relationship with existing settlement and that the allocation will lead to ribbon development along Malcolm Road. The site allocation would affect the setting of the Shoddy Road and bridge. A Masterplan is suggested as a requirement.

19, 603: Object to the excessive scale of the proposed site allocation as the density is inappropriately high for local context which would be alien to established characteristics of the surrounding area.

764: The proposed allocation density is too low.

718: There is a risk of vandalism, noise and more pollution which would impact a peaceful community.

1068: The development will cause issues for residents with specialist needs.

Infrastructure and Services

19, 20, 32, 33, 36, 585, 592, 603, 698, 718, 766, 774, 778, 782, 794, 808, 815, 820, 821, 823, 824, 826, 827, 829, 894, 947, 958, 1023, 1030, 1034, 1061, 1068: Detrimental impact upon capacity of local schools (primary and secondary) and capability of schools to be extended. The capacity of Cults Academy will be reached in 2021 and that primary and secondary school forecasts limited capacity. Potential detrimental impact upon healthcare facilities and that Peterculter Medical Practice is already at capacity. Potential detrimental impact upon local facilities, infrastructure and utilities in general. Concern has been raised with respect to the cost of required infrastructure upgrades.

Concerned over detrimental impact it and other allocated sites will have upon the capacity of local sewers, which are at capacity, and concerns that it could give rise to additional

flooding impacts which exist, particularly to the south east and eastern end of the site. No direct connection is possible to the mains sewer from the site and has concerns regarding the cost to connect to public infrastructure. Specific comment relating to accumulation of stormwater on Malcolm Road during heavy rainfall events and reference to flooding issues at Shoddy Road 8 years ago. Considers that there is likely to be a combined effect of OP51, OP52, OP53 and OP109 on localised flooding. An existing culvert requires upgrade and concern regarding the overflow of combined sewer at a nearby Garden (Eldenside). Internet connection is poor in the area and extra homes would put additional pressure on bandwidth as there is no fibre optic broadband available.

Transport, Roads and Access

19, 20, 585, 603, 627, 698, 717, 718, 774, 778, 794, 808, 815, 820, 821, 823, 826, 827, 829, 844, 894, 958, 1023, 1030, 1034, 1061, 1068: The expected increase in traffic generation could give rise to road safety, parking or other implications. Concerns about speeding traffic. The adequacy of existing road infrastructure to safely accommodate traffic is questioned. The potential to serve the site with safe vehicular access is questioned and respondents consider that there are upgrades required to existing road infrastructure. Specific comments include the suitability of the width of Malcolm Road including at the proposed access point, which apparently cannot be widened, while this road does not allow for trucks to pass one another without mounting the pathway causing pedestrian danger and damaging water and gas pipework. The junctions between Malcolm Road and Shoddy Road and Malcolm Road and North Deeside Road can become congested, are busy with traffic from the nearby quarry and there are poor sight lines and exiting parking issues. Question whether an access point with Shoddy Road can be formed due to third party land ownership constraints. Malcolm Road remains busy since the opening of the Aberdeen West Peripheral Route. There are existing parking issues during home matches at Culter Football Club which would be exacerbated by the proposed development.

826, 829, 1034: There is limited possibility to incorporate a footpath to the site or to widen existing footpaths.

603, 808, 820, 823, 827, 829, 844, 894: There are insufficient existing public transport options to serve the site allocation and the bus stop is 500-800 metres away from site and there is no bus service to the site itself.

20, 808, 815, 820, 821, 823, 829: Impact of the development on nearby core paths and pedestrian routes. Comment includes specific reference to the potential for the site allocation to prevent Culter House Road from becoming a core path while respondents consider the single footpath which swaps side on Malcolm Road unsafe as it forces pedestrians to cross. The Shoddy path would be impacted affecting the amenity of walkers and concern that it is not possible to social distance on the Deeside Way.

32: An exit from the site onto Culter House Road behind Kippie Lodge would prevent Culter House Road becoming a core path while leaving the development cut off from the main settlement in Culter.

592, 794, 808, 820, 821, 823, 824, 827, 829, 894, 958, 1030, 1061, 1068: There are insufficient walkways to serve the site and they are too narrow and dangerous and that there is a lack of pavement access to the site from the village. An increased number of people from the proposed development using paths will negatively impact the countryside in general.

Sustainability

32, 698, 766, 774, 782, 808, 820, 821, 823, 824, 826, 827, 829, 844, 958: The site is remote and outwith the walkable distance of 400 metres from local employment and other services and amenities including sports and recreation space, schools, medical centres, community facilities, shops and services and it is likely that car usage would increase as there is no direct access to these amenities. Further issues raised include a lack of assessment of the site from the perspective of climate change and environmental analysis and a need to comply with sustainable development goals and the commitments by the Scottish Assembly.

782: The site is more suited to environmentally sound planting of forestry and fauna to support air quality improvements.

718, 820, 824: Raise concern with regards pollution from traffic.

Green Belt

19, 20, 603, 627, 698, 774, 778, 794, 808, 815, 820, 821, 823, 826, 827, 829, 947, 958, 1023, 1034, 1061, 1068: Object to the site allocation and rezoning from Green Belt. There are too many proposed and recent developments encroaching local Green Belt and it should not be lost for economic gain and that damage done would be irreparable. The community preference is to retain Green Belt.

Natural Environment

19, 20, 32, 33, 36, 41, 627, 698, 794, 808, 815, 820, 821, 823, 827, 829, 894, 958, 1061, 1068: Potential impact or loss from development upon local green space, green network, landscape character, conservation sites and Ancient Woodland and mature trees, in particular encroachment upon woodland from widening or forming access to site, and that the loss of these spaces would be detrimental to the local community. It is queried why it is acceptable to develop a site with Tree Preservation Orders and respondents also highlight that a large part of the site is to be built on locations where trees were previously illegally felled. Respondents believe that the area should be replanted instead. Concerns over the perceived cumulative effect of OP51, OP52, OP53 and OP109 on green space.

1061: Object due to the impact on the River Dee Special Area of Conservation.

1, 19, 20, 32, 33, 36, 41, 585, 592, 603, 627, 698, 718, 766, 774, 794, 808, 815, 820, 821, 823, 824, 827, 829, 894, 947, 958, 1061, 1068: Potential impact upon local wildlife and protected species, that the site is of high ecological importance and there would be impact upon biodiversity due to loss of habitat. Concerns over cumulative effect of OP51, OP52, OP53 and OP109 on wildlife.

1: The respondent states that the site was an old tip and chemical dump therefore is not suitable for development.

888, 896: The site is elevated therefore would impact on the surrounding landscape. It would comprise a cluster of development relatively isolated from the main settlement, giving the settlement boundary a less defined edge. It is not a logical extension to the settlement and could lead to further incremental development to the north of

Peterculter. The Strategic Environmental Assessment says: "Development will intrude slightly into the landscape. Development would be visible from the A93, and would present as a cluster of housing, rather than the isolated units, or linear residential development." The development will be a challenge to design. Remove the site from the Proposed Local Development Plan. If retained, a Masterplan is required.

Policy Implications

603, 778, 782, 808, 820: The proposed allocation is in conflict with Scottish Planning Policy as the pandemic and change in energy focus reduce demand, on the grounds that the allocation will affect the beauty, wildlife and nature conservation of the area and with regards to the remote location of the site from amenities and the sustainability implications of this and also expectations that the local community will not benefit as the proposal does not provide for a strategic settlement plan.

820, 844, 1061: The allocation does not comply with aims of the Proposed Local Development Plan. New allocations should be on brownfield land that supports sustainable transport and active travel and that the site allocation is contrary to Green Belt policy.

Miscellaneous Comments

769: The boundary shown in the Proposal Map is incorrect and does not match the bid site. Map included with submission (SD XX).

782: There is a lack of clarity with respect to community living and what cost benefits have been provided.

782: There is limited evidence provided to meet changing demands set by world governments translated to community demands and needs for improved quality of life both for now and future generations.

592, 778, 808, 820, 823, 826, 829, 1023, 1030, 1034: There are private land ownership constraints that will affect deliverability of the site allocation.

OP109 - Woodend

1114: The respondent supports the site allocation however requests that the allocation be increased from 19 homes to 24.

109, 627, 794, 1017, 1061: The respondents object to site allocation.

Process

794: The respondent raised concern that the site has been allocated despite being deemed to be 'undesirable' through the Pre-Main Issues and Main Issues Report Development Options Assessment. The respondent raised concern that the decision to allocate the site was made at Full Council Committee on 2 March 2020 when the issue had not been on the agenda and Councillors were given insufficient time to assess 600 pages of documentation. The respondent is concerned with the explanation that the Council was under pressure to allocate sites within a short timeframe in response to

housing target figures set out by the Scottish Government. Environmental impacts not thoroughly assessed.

The Need for Housing

794: The respondent questions the demand for more housing, that there is only limited demand for affordable housing and that too much of this will not be suitable.

More Suitable Alternatives

1061: The respondent states that there are more suitable alternative sites or options for housing.

Layout, Siting and Design

627, 794: The respondents object that allocation will alter the character of the existing village and introduce a suburban character, is unrelated to local context and/or gives rise to visual impacts.

794: The respondent considers it an issue that there is a lack of housing mix, that 100% affordable is not desirable.

Infrastructure and Services

627, 794, 1061: The respondents object to the site allocation due to the perceived detrimental impact upon facilities in general and the capacity of local schools. The respondents also object to the site allocation due to detrimental impact upon healthcare and dental facilities. The respondents raised concerns regarding potential flooding of the site. Combined effect of OP51, OP52, OP53 and OP109 on flooding.

Traffic and Road Safety

627, 794, 1061: The respondents object to the site allocation due to the expected increase in traffic generation which will give rise to road safety and parking implications. The adequacy of existing road infrastructure to accommodate traffic is questioned.

794: The respondent believes that there are insufficient public transport options in proximity to the site which will encourage private car usage.

794, 1061: The respondents question the adequacy of footpaths to serve the site allocation and believe that the increased number of people using paths will negatively impact the countryside.

Sustainability

794: The respondent commented that the site is remote from services and employment.

Environment

627, 794, 1017, 1061: The respondents object to the site allocation and rezoning from Green Belt.

1061: The respondents considers that there will be potential impacts from the proposed development upon landscape, local green space, green network, conservation sites, recreational open space and or Ancient Woodland. Specific comments relates to concerns that insufficient habitat assessment of the sites has taken place.

627, 1061: The respondents considers that there will be potential impacts upon local wildlife.

OP112 - West of Contlaw Road

38, 86, 234, 473, 489, 504, 505, 529, 551, 660, 833, 1014, 1156, 1163, 1168: The respondents object to site allocation.

The Need For Housing

473, 660, 1163: The respondent believes that there is already enough housing in the area. The respondents question how the Region will provide jobs for the new home occupiers.

More Suitable Alternatives

833: The respondent states that there are more suitable alternative sites or options for housing or sufficient allocations elsewhere, specifically brownfield sites.

Report/Process

234: The respondent raised concern regarding the confusion over notification for Proposed Local Development Plan dated 10 June 2020 regarding 10 homes when site has permission for 30.

234: The respondent disagrees with the Council's conclusions that allocation for 30 homes will not unduly affect local character and amenity or result in loss of open space.

Planning Applications

234, 504, 833: The respondents note that planning approval has been granted for 30 houses at this site but allocation state 10 homes.

1163, 1168: The respondents question whether the requirement for 25% affordable units will actually be delivered on these sites.

234: The respondents refer to site history, specifically that the main issues were traffic, lack of schools and loss of woodland and open space.

Policy Issues

833: The respondent highlights paragraph 3.25 of the Proposed Local Development Plan and is in agreement but given age profile of the area it should also identify health and social care provision as constraints.

Layout, Siting and Design

1014: The respondent objects to the site allocation on the grounds that it would create noise impacts.

38, 551: The respondents object on the basis that they consider that the site allocation constitutes overdevelopment.

660: The respondent objects that the allocation will result in a loss of woodland which currently acts as a sound barrier and air filter to the Aberdeen West Peripheral Route.

Infrastructure and Services

38, 234, 473, 660, 1163, 1168: The respondents object to the site allocation due to detrimental impact upon schools and that there is a lack of amenities in general at present.

Traffic and Road Safety

234, 529, 551, 1163, 1168: The respondents object to the site allocation due to the expected increase in traffic generation which will give rise to road safety or other implications. The adequacy of existing road infrastructure to accommodate traffic is questioned. A school bus will be required to enter site which would exacerbate traffic flow. A respondent has concerns about speeding traffic. Culter House Road has no pavements which gives rise to safety issues for pedestrians.

1163: There are insufficient public transport options in proximity to the site.

1156, 1163, 1168: The respondents question the suitability of the core path network to accommodate usage from development and raised concerns in relation to impact on existing routes. The suitability of footpaths along Culter House Road to serve site allocation is questioned.

Sustainability

1163, 1168: The respondent has concerns that the site is remote and outwith walkable distance from local employment and other services and amenities and this will encourage car usage.

Green Belt

505, 660, 833, 1017: The respondents object to the site allocation and rezoning from Green Belt and note that it is the last Green Belt area in Milltimber.

Natural Environment

38, 86, 234, 489, 505, 529, 551, 660, 833, 1014, 1163, 1168, 1156: The respondents raised concerns relating to potential impact from site allocation upon landscape and loss of green space and woodland and mature trees. The protection of the wooded area is supported as it is the last readily accessible woodland in the area. Area offers recreational and wellbeing opportunities which would be negatively affected. Comments include the assertion that the allocation for 10 houses would result in 75 mature trees being lost.

86, 234, 505, 529, 551, 660, 1163, 1168: The respondents raised concerns relating to impact upon local wildlife and protected species.

Miscellaneous Comments

86: The respondent comments that works have begun onsite.

OP113 - Culter House Road

660, 1014, 1156, 1163, 1168: The respondents object to site allocation.

The Need For Housing

1163: The respondent believes that there is already enough housing in the area. The respondent queries how the Region will provide jobs for the new home occupiers.

Planning Application

1163, 1168: The respondents query whether the requirement for 25% affordable units would actually be delivered on these sites.

Infrastructure

1163, 1168: The respondents object to the site allocation due to detrimental impact upon capacity of local schools.

Traffic and Road Safety

1163, 1168: The respondents object to the site allocation due to the expected increase in traffic generation which will give rise to road safety or other implications. The adequacy of existing road infrastructure to accommodate traffic is questioned.

1156, 1163, 1168: The respondents question the suitability of the core path network to accommodate usage from development and raised concerns in relation to impact on existing routes.

Layout, Siting and Design

1014: The respondent objects to the site allocation as they perceive that it would create noise impacts.

Sustainability

1163, 1168: The respondent has concerns that the site is remote and outwith walkable distance from local employment and other services and amenities and this will encourage car usage.

Green Belt

660, 1017: The respondent objects to the site allocation and rezoning from Green Belt.

Natural Environment

660, 1014, 1163, 1168: The respondents object to the site allocation as it will result in the loss of amenity and impact green space and woodland. Replanting of lost trees required. The local playgroup use it to introduce young people to nature.

660: The respondent has concerns regarding the potential loss of woodland which currently acts as a sound barrier and air filter to the Aberdeen West Peripheral Route.

660, 1163, 1168: The respondents raised concerns relating to impact upon local wildlife and protected species.

Modifications sought by those submitting representations:

OP40 - Cults Pumping Station

Layout, Siting and Design and Spatial Strategy

576: Seeks the retention of some of the historical architecture of the pumping station.

576, 833: Seeks the retention of the allotments.

833: Seeks an alternative use for the site such as a civic space.

Transport, Roads and Access

576: Wants to see the public access between the allotments and Cults Burn kept.

OP41 - Friarsfield

The Need For Housing

661: Develop only affordable housing at the site instead.

Transport, Roads and Access

661, 937: Lower the speed limit further along the roadway at each end.

OP43 - Milltimber Primary School

833: Does not want to see the entire site built out.

Process

92: Neighbours should be re-notified and a public database of all representations kept during the notification process.

Layout, Siting and Design

92, 169, 177, 558, 606, 700, 833: The scale of the proposed housing and site density should be limited. Allotments and common spaces should be included.

Infrastructure and Services

317, 700, 833: Do not allow the eastern end of the site prone to flooding to be developed.

Transport, Roads and Access

177, 558, 700: Make improvements to existing road infrastructure.

169, 588: The roadway and pavements of Monearn Gardens should be resurfaced.

169, 558: Monearn Gardens to the North Deeside Road right of way and the right of way to the east of the site should be retained.

Natural Environment

92, 169, 317, 558, 606, 833: Retain mature trees and some green areas within the site.

OP47 - Edgehill

833: Change incorrect reference to Edgehill Road.

833: Remove OP47 from Proposed Local Development Plan.

OP48 - Oldford

1017: Return half of the allocation should as Green Belt designation.

OP50 - Skene Road Hazlehead

78: Remove OP50 from Proposed Local Development Plan.

OP51 - Peterculter Burn

109: Remove OP50 from Proposed Local Development Plan.

More Suitable Alternatives

1061: Develop brownfield sites instead of allocated site.

Layout, Siting and Design

627, 952: The scale of the proposed housing and site density should be limited and include a mixture of affordable and private houses.

Natural Environment

1, 952, 1061: Undertake further assessment with respect to effect upon habitats.

1, 952: Undertake further assessment of the suitability of the tip as a development site.

OP52 - Malcolm Road

More Suitable Alternatives

1061: Develop brownfield sites instead of allocated site.

Natural Environment

1061: Undertake further assessment with respect to effect upon habitats.

OP53 - Tillyoch

3,5, 6, 7, 8 9, 20, 41, 42, 90, 108, 109, 125, 542, 543, 545, 546, 547, 548, 577, 607, 611, 625, 627, 630, 631, 632, 673, 698, 717, 749, 844, 889, 901, 936, 947, 960, 976, 1014, 1055, 1061, 1154, 1194, 1195: Remove the allocation and retain as Green Belt and Green Space Network.

888, 896: modify the site boundary to remove the area of woodland to the south east and the northern section of land.

29: Consideration should be given to more suitable sites in Peterculter that are more easily accessible to village facilities.

542, 543, 630, 1077: Develop brownfield sites instead.

652: A smaller scale development.

653: Review and consultation on the size of the development

1169: Consider half the total amount of OP53. 100 houses in a more confined space at OP53 could work.

888, 896: Exclude the wooded area from the site and add a requirement for developers to demonstrate how woodland would be protected as well as the requirement for the creation of wildlife corridors through the site to connect existing woodland parcels.

OP54 - Craigton

20, 41, 109, 627, 698, 717, 808, 820, 844, 888, 896, 958, 1023, 1030, 1034, 1037, 1061, 1068, 1070: Remove OP54 from the Proposed Local Development Plan.

888, 896: If the site is not removed, a Masterplan is required.

1169: Consider half the total amount of housing.

OP109 - Woodend

1114: Increase the allocation from 19 homes to 24 homes.

More Suitable Alternatives

1061: Develop brownfield sites instead of allocated site.

Natural Environment

1061: Undertake further assessment with respect to effect upon habitats.

OP112 - West of Contlaw Road

More Suitable Alternatives

833: Develop brownfield sites instead of allocated site.

Policy Issues

833: Paragraph 3.25 of the Proposed Local Development Plan should identify health and social care provision as constraints.

OP113 - Culter House Road

Natural Environment

660, 1014, 1163, 1168: Replace the trees which have been and would be lost.

Summary of responses (including reasons) by planning authority:

General Strategy

1, 13, 33, 36, 125, 317, 431, 505, 627, 660, 661, 662, 671, 674, 690, 700, 749, 794, 833, 937, 939, 1007, 1017, 1019, 1061, 1106, 1111, 1156: The Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) identifies a Housing Supply Target of 55,120 homes for the period of 2016 to 2040. Within the Examination of the Aberdeen City and Shire Strategic Development Plan 2020 (Issue 12, pages 153 – 154 CD XX), the Reporter noted that the Housing Need and Demand Assessment undertaken in 2017 (CDXX) in support of the proposed numbers was certified by the Scottish Government's Centre for Housing Market Analysis as being robust and credible. The Reporter's conclusion states the following: "*I find that the promotion of a sizable housing supply target which is very similar in total to that of the previous plans demonstrates a continuing ambitious and aspirational vision for the growth of the city region.*" The Reporter noted that the methodology for calculating Housing Land Requirements matches that set out in Scottish Planning Policy (CD XX).

Paragraph 4.27 of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) recognises that meeting housing and population targets also depends on factors that are not related to this Proposed Local Development Plan, including the state of the economy and, particularly in Aberdeen, the price of oil. However, the Spatial Strategy of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) has been agreed and the Proposed Local Development Plan identifies Aberdeen's contribution towards that. This ensures that the Proposed Local Development Plan can cope with higher levels of demand than we currently expect.

Green Belts are generally permanent, but their boundaries are not static. Each new Local Development Plan has changed Green Belt boundaries in order to accommodate the greenfield development requirements of the time. The Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) states in paragraph 4.18 that "*New allocations should consider opportunities to reuse brownfield land and attempt to utilise the current "constrained" supply in the first instance. However; it is likely that some new development*

will need to take place on greenfield sites in order to help deliver our Vision and future strategy for growth. 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” The Proposed Local Development Plan aims to deliver sustainable communities in the most sustainable locations. The sites put forward have been spread across the City thus providing a range of sites of varying size and complying with paragraph 119 of Scottish Planning Policy (CD XX).

With regards to the potential effects of allocated sites upon the capacity of healthcare and education facilities, NHS Grampian and the Council’s Education Services were consulted in the formation of the Proposed Local Development Plan. Where capacity issues were identified (see School Roll (CD XX)) such as at Cults Academy, such issues can be mitigated by developer contributions.

Deeside General

833: It is agreed that health and social care provision can be a constraint to development. However, such issues can generally be overcome through planning obligations. Transport and Educational Capacity remain the main constraints to further significant development along the Deeside corridor within the next Plan period.

Peterculter General

671: The comments in support of the allocation are noted and welcomed.

1156: The renaming of roads is not a material planning issue.

1, 13, 33, 36, 627, 662, 671, 674, 690, 749, 1007, 1111, 1156: Peterculter is a well-established settlement to the west of Deeside and is a recognised Neighbourhood Centre in the extant Local Development Plan 2017. The Council considers that the continued viability and prosperity of Peterculter is an important goal for maintaining quality of life in Deeside as a whole. The Council has recognised that in order to promote and protect local facilities, shops and infrastructure present within Peterculter it is desirable and necessary to identify sites which are deemed acceptable for residential development and have the potential to enhance the viability of Peterculter both as a population centre and as a Neighbourhood Centre. Strategic Environmental Assessments (CD XX) have been undertaken for each site and impacts upon wildlife taken into account. Concerns over traffic impact and access arrangements are noted, however this will be assessed and agreed at planning application process, in consultation with the Council’s Roads Project Team.

125: Proposed Policy H4 – Housing Mix and Need requires housing development to include housing stock which reflects the diverse needs of the area. This includes older people and those with disabilities.

1007: Flytipping and the maintenance and cleaning of streets are not material planning issues.

1061: A Strategic Environmental Assessment (CD XX) was undertaken for each of the above listed allocations and the potential impacts upon local nature conservation sites and wildlife was taken into consideration. Where appropriate a Habitats Regulations Appraisal has been set out as a requirement. NatureScot were also consulted as part of the

decision-making process with regards the natural environment. With respect to potential flooding impacts, again this issue has been covered for each site by the Strategic Environmental Assessment (CD XX) and where appropriate a Flood Risk Assessment has been set out as a requirement. Proposed Policy NE5 - Trees and Woodland prevents development from resulting in the loss or damage to trees and woodlands. Proposed Policy NE5 - Trees and Woodlands requires applications at OP51, OP52, OP53, OP54 and OP109 to retain existing woodland. Development at these sites will be subject to assessment against Proposed Policy D1 – Quality Placemaking in terms of design. Proposed Policy NE2 – Green and Blue Infrastructure requires all new development to maintain and enhance access rights. While allocations around the north side of Peterculter will result in the development of upon rural land, preserving key natural characteristics and links through the site will be the responsibility of Development Management.

Milltimber General

431, 470, 660, 833 1106, 1007, 1111, 1156: The Proposed Local Development Plan does not identify any further development (and by implication loss of Green Belt) around Milltimber over and above what is already identified in the extant Local Development Plan 2017. In addition, it rezones a former Opportunity Site at Milltimber South back to Green Belt. In general the settlements at Deeside are surrounded by countryside and natural habitat with good access opportunities along the Deeside Line and River Dee. Concerns over traffic impact or access arrangements are noted, however this will be assessed and agreed at planning application process, in consultation with the Council's Roads Project Team. Flytipping and the maintenance and cleaning of streets are not a consideration for a Local Development Plan Examination.

431: The Council have a statutory obligation to publish a Proposed Local Development Plan and thereafter a Local Development Plan within five years of the publication of the previous Plan.

1156: The Scottish Government definition of the term 'Major' applies to application sites which exceed 50 houses as per the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 (CDXX). Housing allocations along the Deeside corridor are relatively limited when compared to all citywide allocations at Bridge of Don, Newhills, Greenferns, Maidencraig/Kingswells Countesswells and Loirston. The A93 has limited capacity to deal with large scale allocations such as these and there are other limiting factors such as steep topography, woodland and the River Dee floodplain.

Cults General

1007, 1019: The Proposed Local Development Plan does not identify any further development (and by implication loss of Green Belt) around Cults over and above what is already identified in the extant Local Development Plan 2017 (CD XX). Fly-tipping and the maintenance and cleaning of streets are not material planning issues.

OP40: - Cults Pumping Station

576: Comments outlining non objection to allocation of OP40 Cults Pumping Station are noted.

576, 833: The allocation was present in the extant Local Development Plan 2017 (CD XX) and consequently the principle of the allocation is considered to be well established. It is a

brownfield site with an interesting, but vacant, granite building which requires a new use in order to secure its continued existence.

Layout, Siting and Design and Spatial Strategy

576: The pumping station is not listed nor is it in a Conservation Area. The acceptability of site design would be managed through the assessment of a planning application. Whilst the retention of the main features may be desirable it is not necessary for the Local Development Plan to be prescriptive on detail. The deliverability of housing at the site while retaining the architectural features of the pumping station is likely to be challenging. In design terms applications are assessed against Proposed Policy D1 – Quality Placemaking.

576, 833: It is specifically mentioned within the text for OP40 in Appendix 2 that 'Development will have to respect green linkages to the west of the site and the retention of the allotments to the east of the site.

833: The allocation provides a sustainable brownfield opportunity with few apparent constraints or challenges for delivery. The site sits adjacent to tennis courts and allotments and is also within approximately 0.6 kilometres of the Core Path network which follows the River Dee and Inchgarth Reservoir. Whilst a residential use has been advocated, there is nothing in the Proposed Local Development Plan which would prevent an alternative development of the type described taking place.

Transport, Roads and Access

576: Core Path 63 travels alongside the length of Cults Burn, past the southern edge of the pumping station and across North Deeside Road until it joins Den of Cults. Proposed Policy NE2 – Green and Blue Infrastructure states that new development will maintain and enhance the integrity of existing access rights including core paths.

OP41 - Friarsfield

661, 937: The wider site allocation was present in the Local Development Plan 2012 (CD XX) and the extant Local Development Plan 2017 (CD XX) and consequently the principle of the amended allocation is considered to be well established. The site is included as a Masterplan Zone and most of the homes have been delivered.

The Need For Housing

661: The Aberdeen City and Shire Housing Land Audit 2020 (CD XX) outlines that 164 houses have been delivered and there are 137 left to complete at the site. Proposed Policy H5 Affordable Housing requires housing developments of five homes or more to contribute no less than 25% of the total number of homes as affordable housing. In tandem to this the Council's Local Housing Strategy (CD XX) includes indicative housing supply targets for affordable housing and the Council has an obligation to fund the delivery of affordable housing directly.

Infrastructure and Services

661, 937: NHS Grampian and the Council's Education Services were consulted in the formation of the Proposed Local Plan. Friarsfield is a well-established site. The expected

number of homes and pupils arising from this development have been accounted for in the School Roll Forecasts (CD XX). Friarsfield is included as a Masterplan Zone and Section 4 of the Proposed Local Development Plan outlines the infrastructure requirements for this site including the requirement to extend the existing Health Centre to accommodate one additional GP, two additional dentist chairs and one new Community Pharmacy.

Transport, Roads and Access

661, 937: There is an agreed Friarsfield Framework for this site (CDXX) and planning approval has been granted for housing and as such traffic and road safety issues have been assessed by the Council's Roads Project Team and the proposal found to be acceptable. New subsequent phases will be required to undergo further traffic assessments. Control of speed limits along stretches of roadway is a matter to be controlled by the Roads Project Team rather than a planning issue.

Natural Environment

661, 937: The site comprises agricultural fields which rather than public open space. The site sits adjacent to the wooded area to the west. Proposed Policy NE5 Trees and Woodland ensures that development will not result in the loss of or damage to trees and woodland. The Masterplan (CDXX) shows that open space and tree planting is proposed within the allocated site.

937: The wider site allocation was present in the extant Local Development Plan 2017 (CD XX) and consequently the principle of the amended allocation is considered to be well established. Strategic Environmental Assessments (CD XX) were undertaken previously and as part of the process for devising the Proposed Local Development Plan. As set out in Appendix 2 for this site a Habitats Regulations Appraisal is required to accompany development proposals at this site in order to avoid adverse effects upon the qualifying interests of the River Dee Special Area of Conservation and a Construction Environmental Management Plan (CEMP) is likely to be required.

OP43 - Milltimber Primary School

177, 558: Support for the principle of development of the allocation is noted and welcomed.

833: The grassed area of the site (school playing fields) is covered by Proposed Policy NE2 – Green and Blue Infrastructure; Urban Green Space and will therefore be protected or replaced in accordance with this policy.

92, 169, 137, 317, 606, 700, 833: This allocation has been carried forward from the previous two Local Development Plans (Local Development Plan 2012, site reference OP55 (CDXX)) (extant Local Development Plan 2017, site reference – OP43 (CDXX)) and was previously considered by Reporters during Examination of these Plans (under Issue 46 for the Local Development Plan 2012 (CD XX) and under Issue 11 for the extant Local Development Plan 2017 (CD XX)). The site is likely to become available in the future due to the development at Oldfold providing a new school.

Process

92: The period for public representation on the Proposed Local Development Plan ran between 20 May and 31 August 2020, an additional 9 weeks compared to the 6-week minimum statutory timescales. Notification letters were sent out to the relevant parties on the 10 June which is within required timescales. Though it is not a statutory requirement, all representations are available to view on the Council's website throughout the representation process. Further details on the overall representation process can be seen in the Report of Conformity and the Participation Statement (CD XX).

Layout, Siting and Design

92, 169, 177, 558, 606, 700, 833: At the present time there is no planning application or design brief for the site therefore specific questions regarding the proposed density or design of the site are unable to be answered at this time. There will be, in due course, more opportunities for the public to comment on this site when a planning application or design brief is lodged. Currently all comments regarding the layout and design of the proposed development have been noted. Policy D1 – Quality Placemaking is applicable to assessment of design issues and placemaking.

606: The loss of a view is not a material planning consideration. However, the design of any proposed scheme will be assessed through the application of Policy D1 – Quality Placemaking.

Infrastructure and Services

317, 700, 833: A new primary school is under construction at OP48 Oldford to replace the existing primary school at this site. A Flood Risk Assessment will be required to accompany any future development proposals, and this is mentioned in the list of Opportunity Sites under Appendix 2 of the Proposed Local Development Plan. Flooding and drainage issues would be addressed and agreed at planning application stage, in consultation with the Council's Flooding Team. Policy NE4 – Our Water Environment does not allow for development to increase incidence of flooding through the discharge of additional surface water.

Transport, Roads and Access

177, 558, 700: Concerns over traffic impact and access arrangements are noted, however this will be assessed and agreed at planning application process, in consultation with the Council's Roads Project Team.

169, 588: The repair of road and pavement surfaces does not relate to planning and is not something which can be addressed through the planning process as developer contributions cannot be collected for ongoing maintenance. The continuous usage of the road by parents dropping off and picking up children from the school is likely to cause more wear and tear than the limited time period that construction vehicles will use the road.

169, 558: The protection of existing rights of way is a consideration for any future planning application received for this site. Policy NE2 – Green and Blue Infrastructure states that new development will maintain and enhance the integrity of existing access rights including rights of way.

Natural Environment

92, 169, 317, 558, 606, 833: Although not specifically identified as Urban Green Space on the Proposals Map (CD XX) due to the small scale of the site, the grassed area of the site (school playing fields) is covered by Proposed Policy NE2 – Green and Blue Infrastructure and will therefore be protected or replaced in accordance with this policy. With regards the protection of mature trees, this issue would be address via the consideration of any planning application for the site, giving due consideration to Proposed Policy NE5 Trees and Woodlands.

Miscellaneous Comments

700: Noise, construction traffic and construction site security are not material planning matters. Health and Safety Executive legislation separate to planning addresses these issues.

92: Allocations will not exclusively be made on land which is owned by Aberdeen City Council and land ownership issues are considered to be a civil matter.

OP44 - North Lasts Quarry

580: Comments outlining support for the allocation are noted and welcomed.

OP47 - Edgehill

833, 1156: The allocation was present in the extant Local Development Plan 2017 (CD XX) and consequently the principle of the allocation is considered to be well established.

833: We accept this as a typographical error and will change the reference to Edgehill.

833: The site has not been completely built out at the time of writing and the opportunity for housing at the site remains.

1156: The allocation is for five homes only. Culter House Road is a single width road and vehicular speeds are consequently low and unlikely to be problematic for pedestrians. Applications at this site have been assessed by the Council's Roads Project Team and a lack of formal footway has not been deemed to be a reason for refusal.

OP48 - Oldford

58, 1017: The site allocation was present in the extant Local Development Plan 2017 (CD XX) and consequently the principle of the allocation is considered to be well established. It has planning consent and is under construction.

58: Issues of potential noise impacts from construction are not material to planning. Such impacts are controlled through other legislation by the Health and Safety Executive.

1017: A proportion of the site has already been built out and a Development Framework and Masterplan (CDXX) has been produced which is listed in Appendix 3. A proportion of the site has been set for publicly usable open space.

OP50 - Skene Road Hazlehead

78: Ecological surveys will be necessary for this site, including any required mitigation measures relative to the proposals. Due regard will be given to Proposed Policy NE2 - Green Space Network and Proposed Policy NE3 - Our Natural Heritage when planning new developments to ensure habitat links are maintained and enhanced.

OP51 - Peterculter Burn

764: The comments made in respect to the preference of the allocation over OP53 are noted.

1, 109, 627, 952, 1017, 1061: The site allocation was present in the Local Development Plan 2012 (CD XX) and is allocated in the extant Local Development Plan 2017 (CD XX) and consequently the principle of the allocation is considered to be well established. There is no significant change in circumstances that would justify amendment to this allocation.

Layout, Siting and Design

627, 952: Proposed Policy H4 – Housing Mix and Need requires development of over 50 homes to include a suitable mix of house sizes and include housing which meets diverse needs. Any subsequent applications which come forward under the new Plan period will be subject to consideration against Proposed Policy D1 – Quality Placemaking and Proposed Policy D2 - Amenity and such applications would be subject to public consultation.

Infrastructure and Services

627, 952, 1061: Flooding and drainage issues would be addressed and agreed at planning application stage, in consultation with the Council's Flooding Team. Appendix 2 sets out the requirement for a Flood Risk Assessment to be submitted in support of any proposals at the site. Proposed Policy NE4 – Our Water Environment does not allow for development to increase incidence of flooding through the discharge of additional surface water.

Traffic and Road Safety

627, 1061: Concerns over traffic impact and access arrangements are noted, however this will be assessed and agreed at planning application process, in consultation with the Council's Roads Project Team.

952: Concerns over the accessibility of the site for waste collection vehicles are noted, however this will be assessed and agreed at planning application process, in consultation with the Council's Roads Project Team and Waste Service Team. The ownership and access rights of the lane are a civil matter.

1061: Malcolm Road is not directly adjacent to the allocated site and the suitability of the footways is not a reason to preclude the site from being allocated. It is noted that there is a footway or space for pedestrian traffic along the length of the road from Cornyhaugh Road to the centre of the village. The allocation on 19 houses at OP51 is fairly modest and would not result in a significant increase in pedestrian traffic along Malcolm Road.

Sustainability

1061: Representations made reference to the distance to local facilities from the site. It is recognised that this site lies out with 800 metres from the neighbourhood centre of Peterculter. It is, however, considered that a residential development here would provide additional support to the community of Peterculter and to the neighbourhood centre. It is reasonable to expect that residents of this site would make use of Peterculter and its facilities and contribute towards its sustainability. Bid Sites to the south west of Peterculter which were closer to the settlement centre were found to have an unacceptable impact upon the surrounding landscape and setting of the Peterculter.

Natural Environment

1, 952, 1061: A Strategic Environmental Assessment (CD XX) was undertaken for the site and the potential impacts upon local nature conservation sites and wildlife was taken into consideration. NatureScot were also consulted as part of the decision making process with regards the natural environment. Proposed Policy NE5 Trees and Woodland prevents development from resulting in the loss or damage to trees and woodlands. Appendix 2 sets out the requirement for a Planning Brief to set out specific measures to avoid damage to and enhance the Local Nature Conservation Site.

1, 627, 952, 1061: Appendix 2 outlines that a Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee Special Area of Conservation. A Construction Environmental Management Plan is also required.

1, 952: The suitability of the site with regards to its past use would be assessed by Environmental Health officers in the event of a planning application being received and if required necessary mitigation measures set out.

OP52 - Malcolm Road

109, 627, 718, 1017, 1061: The site is allocated for eight houses in the extant Local Development Plan 2017 (CD XX). The principle of the allocation is considered well established.

Layout, Siting and Design

627, 718: The Council considers that this site is a natural extension to the existing community of Peterculter. Despite its elevated position, the site is screened to some degree by the mature tree belt along Malcolm Road. Currently there is no planning application or design brief for the site therefore specific questions regarding design character of the site are unable to be answered at this time. There will be, in due course, more opportunities for the public to comment on this site when a planning application or design brief is lodged. At the moment all comments regarding the layout and design of the proposed development have been noted. Any application would be required to comply with the terms of Proposed Policy D1 – Quality Placemaking.

718: Issues of vandalism and pollution from traffic are not considerations for a Local Development Plan examination. With regards to the use of the site for housing, noise would not be a primary concern anyway. The Development Management process will assess any application against Proposed Policy D1 – Quality Placemaking to ensure that residential amenity is preserved.

Infrastructure and Services

627, 718, 1061: The Strategic Environmental Assessment (CD XX) outlined that SEPA maps show there is low to medium risk of flooding in two separate areas, one to the east and one to the west of the site and a Drainage Impact Assessment is required to be submitted alongside appropriate sustainable urban drainage system provision. The potential requirement for a Flood Risk Assessment is identified in Appendix 2. Proposed Policy NE4 – Our Water Environment does not allow for development to increase incidence of flooding through the discharge of additional surface water. Issues with the main sewer can be dealt with at the planning application stage.

Traffic and Road Safety

627, 718, 1061: The Council note the level of objection to this site based on the assertion that Malcolm Road is sub-standard and not suitable for the increased traffic that any development would facilitate. Discussions between any developer and the Local Authority Roads Department would be required to address the access issue but it is not considered that there are any technical concerns which prevent access being taken from Malcolm Road to the proposed site. Perceived deficiencies in Malcolm Road itself, for the level of traffic to be generated, can also be addressed at the planning application stage are not deemed to preclude designation for residential use.

1061: It is noted that there is only one footway along Malcolm Road on the west side beyond the junction with Bucklerburn Road and the east side to the south of this point. This crossing point has clear sight lines in both directions and vehicle speeds are restricted to 30 miles per hour at this point. The pavement is also wide enough to accommodate pedestrians passing in both directions.

Natural Environment

1061: A Strategic Environmental Assessment (CD XX) was undertaken for the site and the potential impacts upon Local Nature Conservation Sites and wildlife was taken into consideration. A Habitats Regulations Appraisal has been set out as a requirement. NatureScot were also consulted as part of the decision making process with regards the natural environment. The site is designated as Ancient Woodland. Any development would be required to mitigate for any loss to established Woodland and comply with Policy NE5 of the Proposed Local Development Plan. Appendix 2 - Opportunity Sites sets out the requirement to retain the Scots Pines on the western boundary. These issues do not preclude designation as an Opportunity Site and can be dealt at the planning application stage. The Council considers that this site is a natural extension to the existing community of Peterculter. Despite its elevated position, the existing trees, along with further supplementary planting should provide adequate screening of the site from the surrounding area and will reduce any landscape impacts arising from housing development there.

627, 718, 1061: Appendix 2 - Opportunities Sites outlines that a Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee Special Area of Conservation. A Construction Environmental Management Plan is also required.

Miscellaneous

1061: Any ground works which have been undertaken and which require planning permission can be dealt with by the Planning Enforcement team and this does not preclude the site being allocated.

General for OP53 and OP54

Running parallel to the production of the Proposed Local Development Plan was the examination of the Proposed Strategic Development Plan 2018. The Proposed Strategic Development Plan was submitted to the Planning and Environmental Appeals Division of the Scottish Government in April 2019. The report of examination was not received by the Aberdeen City and Shire Strategic Development Planning Authority until January 2020. The report of examination included suggested modifications to table 3 of the Proposed Strategic Development Plan 2018 which increased the Housing Allowances of any subsequent Aberdeen and Aberdeenshire Local Development Plans by an additional 939 new homes for the period 2020-2032. The approval of a Strategic Development Plan is the responsibility of the Scottish Government and there is not statutory period of time set in which it must be approved. There is, however, a statutory period of review for a Local Development Plan and consequences should this not be met. Paragraph 24 of Circular 6/2013 Development Planning states "planning authorities are expected to move quickly from the Main Issues Report through to the Proposed Local Development Plan and towards submission to Scottish Ministers and adoption". Having completed the Main Issues Report consultation, being mindful of the Circular and the statutory review period additional sites, which had come through the call for sites and Main Issues Report Consultation, were selected for inclusion in the Proposed Local Development Plan. This ensured that the Housing Allowances as set in the Aberdeen City and Shire Strategic Development Plan, which is a statutory document that the Local Development Plan must align with, are met. The sites put forward to meet the addition 939 have been spread across the City thus providing a range of sites of varying size and complying with paragraph 119 of Scottish Planning Policy (CD XX).

OP53 - Tillyoch

1, 2, 3, 5, 6, 7, 8, 9, 10, 14, 15, 16, 17, 19, 20, 29, 32, 41, 42, 90, 108, 125, 149, 159, 234, 542, 543, 545, 546, 547, 548, 577, 607, 611, 614, 625, 627, 630, 631, 652, 653, 658, 673, 698, 713, 717, 749, 755, 764, 789, 794, 808, 811, 827, 838, 844, 853, 865, 881, 889, 894, 899, 901, 923, 936, 947, 960, 976, 1044, 1055, 1156, 1061, 1073, 1077, 1154, 1163, 1168, 1169, 1179, 1184, 1194, 1195: The Council notes the level of objection.

951,1128: The Council notes the support for the allocation.

1156: If allocated the site will be masterplanned in line with Policy H4 of the Proposed Local Development Plan which requires a Masterplan for sites with 50 homes or more. OP54 is a site proposed for 10 homes but is more than 2 hectares therefore the decision to masterplan this site will be at the discretion of the Case Officer at any subsequent planning application stage and will depend on the details of any planning application that is submitted should the site be allocated.

The Need For Housing

29, 42, 542, 543, 545, 546, 547, 548, 614, 630, 632, 698, 755, 789, 794, 827, 838, 853, 881, 894, 901, 947, 960, 976, 1077, 1163, 1169, 1194, 1195:

Scottish Planning Policy paragraph 110 (CD XX) identifies the requirement to ensure there is a 'generous' supply of appropriate and effective land for the provision of a range of housing. In addition, Local Development Plans are required to allocate land for housing on a range of sites that are effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted date of adoption ensuring a minimum five-year supply of effective housing land at all times.

Table 3 on page 30 of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX), which was approved by the Scottish Ministers on 12th August 2020, sets out the proposed housing allowances for Aberdeen City for the period of the Local Development Plan, ensuring that a generous supply of land for housing is provided which will allow further choice and flexibility in the housing market. The Housing Allowances in the Proposed Local Development Plan have been informed by the Aberdeen City and Shire Housing Land Audit 2019 (CD XX) which measures Housing Land Supply.

The Proposed Local Development Plan needs to show how the Council will meet the 5,107-housing allowance which the Strategic Development Plan sets for Aberdeen for the period to 2032. Details of this are provided in Section 3 of the Proposed Local Development Plan and under Issue 2: Housing Land. OP53 is one of the sites identified in the Proposed Local Development Plan to meet the Strategic Development Plan allowance.

The Proposed Local Development Plan at paragraph 3.6, page 22, acknowledges the importance of brownfield sites and considering them for development first. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states that new housing allocations should reuse brownfield land and attempt to utilise the current constrained supply in the first instance. The Proposed Local Development Plan endorses that approach and looks to ensure that at least 40% of all new housing in Aberdeen is built on brownfield sites in line with Aberdeen City and Shire Strategic Development Plan targets. However, both the Strategic Development Plan and the Proposed Local Development Plan Schedule 4 on Housing Land (Issue 2) acknowledge that brownfield sites cannot meet this allowance on their own. Greenfield sites are also required to ensure a continuing five-year effective supply throughout the lifetime of the Proposed Local Development Plan.

More Suitable Alternatives

29, 542, 543, 630, 652, 653, 755, 881, 976, 1169, 1077: The Council considers the allocation of this site will provide good choice and location for housing in the area. The Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) requires Aberdeen City and Aberdeenshire to identify land which is effective or expected to become effective to meet housing land requirements up to year 10 from predicted date of development. In doing so a minimum of five-years effective land supply is to be ensured at all times.

The Proposed Local Development Plan at paragraph 3.6, page 22, acknowledges the importance of brownfield sites. However as discussed above and in further detail in Issue 2: Housing Land, greenfield sites are also required to ensure a continuing five-year effective supply. The Proposed Local Development Plan endorses that approach and also looks to ensure that at least 40% of all new housing in Aberdeen is built on brownfield sites in line with the Aberdeen City and Shire Strategic Development Plan 2020 Targets.

The Council considers that this site is already developed. The site received planning approval in January 2009 to develop the Tillyoch Pet Resort and Equestrian Centre. On the site presently there are 8 large building with a variety of uses, a large dwelling house and a cattery for 140 cats, the outdoor riding school covers around 12 acres, there is hard standing parking for 200 cars and parking for 80 horse boxes/lorries. The site already sits between further two sites which were allocated in the extant Local Development Plan 2017: OP109 for 19 houses and OP52 for 8 houses.

The Council consider the allocation of this site would benefit the local community and note the Community Council's comments where they identified a need for new homes for growing families in their Pre-Main Issues Report comments. The proposed 250 homes on the site is considered reasonable and will ensure the site is viable. Reducing the number of homes on the site is not supported.

853: The allocation is for 250 homes on the site. Any planning application which may come forward will consider details and impacts on the threat to nature conservation, road infrastructure, school and medical facility capacity, landscape, proximity to community facilities and employment and design and layout and mix of housing etc.

Reports / Object to Procedure to Allocate Site

6, 8, 19, 20, 32, 41, 90, 108, 542, 543, 545, 546, 547, 548, 611, 625, 631, 698, 717, 764, 789, 794, 808, 838, 853, 865, 881, 899, 901, 947, 960, 976, 1061, 1156, 1169, 1194, 1195: Running parallel to the production of the Proposed Local Development Plan was the Examination of the Proposed Strategic Development Plan 2018. The Proposed Strategic Development Plan was submitted to the Planning and Environmental Appeals Division (DPEA) of the Scottish Government in April 2019. The Report of Examination (CD XX) was not received by the Aberdeen City and Shire Strategic Development Planning Authority until January 2020. The Report of Examination included suggested modifications to Table 3 of the Proposed Strategic Development Plan 2018 (CD XX) which increased the Housing Allowances of any subsequent Aberdeen and Aberdeenshire Local Development Plans by an additional 939 new homes for the period 2020-2032. The approval of a Strategic Development Plan is the responsibility of the Scottish Government and there is not a statutory period of time set in which it must be approved. There is, however, a statutory period of review for a Local Development Plan and consequences for a local authority should this not be met. Paragraph 24 of Circular 6/2013 - Development Planning (CDXX) states that: "*planning authorities are expected to move quickly from the Main Issues Report through to the Proposed Local Development Plan and towards submission to Scottish Ministers and adoption*". Having completed the Main Issues Report consultation, being mindful of the Circular and the statutory review period, a number of additional sites, which had come through the Call for Sites and Main Issues Report consultation stage, were selected for inclusion in the Proposed Local Development Plan. This ensured that the Housing Allowances as set in the Strategic Development Plan, which is a statutory document that the Local Development Plan must align with, are met. The sites put forward to meet the addition 939 homes required by the Examination into the Strategic Development Plan have been spread across the City thus providing a range of sites of varying size and complying with paragraph 119 of Scottish Planning Policy.

The Minutes of Full Council on 2nd March 2020 (CD XX) record that a rationale was given for the decision to allocate the site.

The Council considers the allocation of this site will provide good choice and location for housing in the area and will help to support local schools, services and facilities. The Aberdeen City and Shire Strategic Development Plan 2020 requires Aberdeen City and Aberdeenshire to identify land which is effective or expected to become effective to meet housing land requirements up to year 10 from predicted date of development. In doing so a minimum of five-years effective land supply is to be ensured at all times.

A call for representations on the Proposed Local Development Plan was advertised in the press and on social media. The requirement to hold this process is set in legislation and the time given is usually 6 weeks. Due to the current COVID situation the Council and Officers agreed to run the process for an additional 8 weeks. 17,000 letters were sent out to addresses 20 metres from the proposed zone sites as required by legislation under the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 (CD XX). Further details on the consultation process can be found in the Statement of Conformity with Participation Statement.

7, 9, 717, 853, 1061, 1169: The Strategic Environmental Assessment which accompanies the Proposed Local Development Plan at page 85 identifies that a Flood Risk Assessment would be required, along with Habitats Regulations Appraisal to accompany development proposals. On page 131 of the Strategic Environmental Assessment, it is considered that water abstraction associated with the opportunity sites identified in the Proposed Local Development Plan will not have an adverse effect on the River Dee Special Area of Conservation. At page 135 it is explained that it is not possible at the moment to assess site specific details of the effect of construction and that a project Habitats Regulations Appraisal and Construction Environmental Management Plan would be required. Appendix 2 of the Proposed Local Development Plan concludes that adverse effects on site integrity can be avoided in relation to potential construction impacts on the Opportunity Sites.

Any applicant would be required to demonstrate at planning application stage that there would be no significant adverse impact on the environment surrounding the site and will be required to adhere to Development Plan policies and the submission of any environmental surveys or assessments required as supporting justification for any development.

545, 546, 547, 548, 901, 1194, 1195: Publication and notification was carried out in line with legislation and is detailed in the Report of Conformity with Participation Statement. The Proposal of Application Notice process is separate from the Examination process.

717: It is standard practice for developers to have an option on sites with ownership remaining elsewhere. The availability of public funding is not an issue for consideration at this point.

17, 32, 41, 90, 755, 794, 808, 853, 881, 901: If allocated, the affect of any development on the site would have on the equestrian/pet facility would be considered at planning application stage where the Council would consult with statutory consultees as well as undertaking neighbour notification and any developer would be required to undertake statutory consultation ahead of submitting a Major planning application. The funding of the pet resort/equestrian facility in the past is not a planning consideration.

General Area Strategy

577, 827, 844, 6, 8, 125, 853, 19, 625, 853, 894, 923, 1169, 889, 625, 631, 827, 838, 853: The Council considers the allocation of this site will provide good choice and location for housing in the area which will also support local schools, services and facilities. The Council recognises a balance needs to be achieved in protecting the natural environment and providing housing hence the councils intention to retain the Green Space Network on the woodland in the southeast of the site, if allocated. The Council acknowledges that sensitive development is required ensuring consideration is given to existing neighbours and the natural environment, this will then provide we believe, an area that will contribute to the wider community's benefit.

Layout, Siting and Design

17, 19, 29, 542, 543, 545, 603, 607, 625, 627, 631, 653, 713, 794, 808, 811, 827, 838, 853, 901, 947, 1179: If allocated, during assessment of any forthcoming planning application at the site that the layout, siting and design would be assessed. Any developer would be required to submit details to the Planning Authority on layout, siting and design proposed in compliance with Proposed Local Development Plan design policies such as Policy D1 – Quality Palcemaking.

Infrastructure and Services

2, 3, 5, 6, 15, 16, 17, 19, 20, 32, 41, 90, 125, 149, 159, 542, 543, 611, 614, 625, 631, 632, 652, 653, 658, 698, 713, 717, 749, 789, 794, 808, 827, 838, 844, 853, 865, 881, 894, 899, 901, 923, 936, 960, 976, 1044, 1061, 1128, 1163, 1168, 1169, 1179, 1184, 1194, 1195: If allocated, any applicant at the planning application stage for a proposed residential development would be required to demonstrate through supporting information that there would not be a significant detrimental impact on infrastructure and services.

The Council could seek developer contributions towards healthcare facilities to mitigate any potential impact upon services in line with Proposed Local Development Plan's Policy I1 - Infrastructure Delivery and Planning Obligations.

It will be at planning application stage that any applicant would be required to demonstrate there would be no significant adverse impact on the environment surrounding the site and will be required to adhere to relevant Development Plan policies and submission of any environmental surveys or assessments (including for flooding) required as supporting justification for any development.

Transport, Roads and Access

2, 3, 6, 7, 9, 15, 17, 19, 20, 32, 90, 125, 149, 159, 542, 543, 607, 611, 625, 631, 625, 627, 630, 631, 652, 653, 658, 713, 717, 749, 755, 789, 794, 808, 827, 838, 844, 853, 881, 894, 901, 923, 960, 976, 1061, 1073, 1077, 1128, 1154, 1163, 1168, 1179, 1184, 1194, 1195: If allocated it will be at planning applications stage that any applicant would be required to demonstrate through supporting information that there would not be a significant detrimental impact on roads infrastructure and safety and trees. The Council could seek developer contributions towards any potential transport impacts and towards the creation or upgrading of core paths in accordance with the relevant policies in the Proposed Local Development Plan. Land ownership issues, if any, are not a planning consideration.

Sustainability

7, 9, 16, 17, 29, 32, 41, 42, 90, 125, 542, 543, 611, 614, 625, 630, 631, 632, 652, 653, 717, 755, 789, 808, 827, 838, 844, 853, 881, 901, 923, 960, 976, 1077, 1163, 1168, 1179, 1184, 1194, 1195: The Council recognises a balance needs to be achieved in protecting the natural environment and providing housing hence the councils intention to retain the Green Space Network on the woodland in the southeast of the site. The Council acknowledges that sensitive development is required ensuring consideration is given to existing neighbours and the natural environment, this will then provide we believe, an area that will contribute to the wider community's enjoyment.

The Proposed Local Development Plan encourages sustainability throughout and at page 71, Policy R6, provides that all new buildings will be required to demonstrate a proportion of the carbon emissions reduction standard set by Scottish Building Standards will be met through the installation and operation of low and zero carbon generating technology.

Green Belt:

2, 6, 19, 20, 29, 542, 543, 545, 546, 547, 548, 577, 607, 611, 627, 630, 631, 652, 653, 658, 698, 749, 789, 794, 808, 811, 827, 838, 853, 881, 899, 901, 923, 947, 960, 976, 1061, 1077, 1154, 1177, 1184: The Council considered OP53 suitable for further development as it already has development on site. On the site presently there are eight large buildings with a variety of uses, a large dwelling house and a cattery for 140 cats, the outdoor riding school covers around 12 acres, there is hard standing parking for 200 cars and parking for 80 horse boxes/lorries. The site already sits between further two sites which were allocated in the extant Local Development Plan 2017 as OP109 for 19 houses and OP52 for eight houses. It is not visible from a wide area and its contribution to the wider landscape setting of Aberdeen is considered limited. Recreational opportunities within the site can be maintained and enhanced.

Natural Environment:

2, 3, 7, 16, 17, 19, 20, 29, 32, 41, 42, 90, 108, 109, 125, 149, 159, 542, 543, 545, 546, 547, 548, 611, 614, 625, 627, 630, 631, 632, 652, 653, 673, 698, 713, 717, 749, 755, 789, 808, 811, 827, 838, 844, 853, 881, 888, 894, 896, 899, 901, 923, 936, 960, 1014, 1017, 1044, 1055, 1061, 1154, 1163, 1168, 1169, 1177, 1179, 1184, 1194, 1195: The Council acknowledges that sensitive development is required ensuring consideration is given to existing neighbours and the natural environment, this will then provide we believe, an area that will contribute to the wider community's enjoyment. Altering the site boundary to remove the area of woodland to the south east and the northern section of land are not required. The Proposed Local Development Plan protects trees and woodlands, and landscape through Proposed Policies NE5, D4 and D5. Furthermore, the site will be subject to a Masterplan exercise where open space, trees and woodland and landscape concerns can be considered and finalising in the detailed design of any proposal that comes forward.

It will be at planning application stage that any applicant would be required to demonstrate there would be no significant adverse impact on the environment surrounding the site and will be required to adhere to relevant development plan policies and submission of any environmental surveys or assessments (including for flooding) required as supporting justification for any development.

888, 896: It is acknowledged that the Peterculter Local Nature Conservation Site (CDXX) runs through the site. The site will require a Masterplan which can take account of the

Peterculter Local Nature Conservation Site, wildlife links and corridors. This could enable doorstep opportunities for outdoor recreational access to natural open space in a managed way. In this way, well designed development could enhance biodiversity in line with Proposed Policy NE3 - Our Natural Heritage, increase access to natural open space and open up walking and recreation opportunities. Inclusion of the Peterculter Local Nature Conservation Site within the site boundary can allow it to be managed to provide doorstep access opportunities for local residents. There are other allocated sites within the Proposed Local Development Plan with similar arrangements, including OP9 Grandhome, OP20 Craibstone South and OP59 Loirston.

Policy Implications:

125, 808, 853, 653, 844, 901, 853, 901, 923, 960, 1061: Scottish Planning Policy paragraph 110 identifies the requirement to ensure there is a 'generous' supply of appropriate and effective land for the provision of a range of housing. The Council took the Local Place Plan (CDXX) into account in its rationale explained verbally at a meeting of Full Council on 2nd March 2020. The Council considers the allocation of this site will provide good choice and location for housing in the area. If allocated any prospective development will be assessed against the relevant policies in place at the time.

Miscellaneous Comments

853, 717, 630, 1184: Whether potential new development would 'introduce transient people' into the community is not a material planning consideration. Disruption, noise and inconvenience caused by a prospective development is not a material consideration. If allocated it will be at planning application stage that the presence of pylons can be taken into account when masterplanning the site and when finalising the detailed design of the proposal.

OP54: Craigton

General

1, 19, 20, 32, 33, 36, 41, 109, 585, 592, 603, 627, 698, 717, 718, 764, 766, 774, 778, 782, 794, 698, 808, 815, 820, 821, 823, 824, 826, 827, 829, 844, 888, 894, 896, 947, 958, 1023, 1030, 1034, 1037, 1061, 1068, 1070: The rationale for this site was explained verbally at a meeting of full Council on 2nd March 2020. There is already existing housing on three sides of the site with no set pattern. The centre of the village providing facilities is close by, the current capacity at the school is able to accommodate the number of houses proposed. We believe an enhanced landscape setting could be delivered which would balance out the rezoning from Green Belt and Green Space Network to residential. 769: Support for the site is noted and welcomed.

888, 896, 1156: Proposed Policy H4 of the Proposed Local Development Plan requires a Masterplan for sites with 50 homes or more. OP54 is a site proposed for 10 homes but is more than 2 hectares. Therefore, the decision to Masterplan this site will be at the discretion of the Case Officer and will depend on the details of any planning application that is submitted should the site be allocated.

The Need for Housing

33, 36, 42, 585, 766, 778, 782, 820, 821, 823, 827, 894: Scottish Planning Policy paragraph 110 identifies the requirement to ensure there is a 'generous' supply of appropriate and effective land for the provision of a range of housing. In addition, Local Development Plans are required to allocate land for housing on a range of sites that are effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted date of adoption ensuring a minimum five-year supply of effective housing land at all times.

Table 3 on page 30 of the Aberdeen City and Shire Strategic Development Plan 2020, which was approved by the Scottish Ministers on 12 August 2020, sets out the proposed housing allowances for Aberdeen City for the period of the Proposed Local Development Plan, ensuring that a generous supply of land for housing is provided which will allow further choice and flexibility in the housing market. The Housing Allowances in the Proposed Local Development Plan have been informed by the Aberdeen City and Shire Housing Land Audit 2019 (CDXX) which measures Housing Land Supply.

The Proposed Local Development Plan needs to show how the Council will meet the 5,107-housing allowance which the Strategic Development Plan sets for Aberdeen for the period to 2032. Details of this are provided in Section 3 of the Proposed Local Development Plan and under Issue 2: Housing Land. OP53 is one of the sites identified in the Proposed Local Development Plan to meet the Aberdeen City and Shire Strategic Development Plan allowances.

The Proposed Local Development Plan at paragraph 3.6, page 22, acknowledges the importance of Brownfield sites and considering them for development first. The Aberdeen City and Shire Strategic Development Plan 2020 states that new housing allocations should reuse brownfield land and attempt to utilise the current constrained supply in the first instance. The Proposed Local Development Plan endorses that approach and looks to ensure that at least 40% of all new housing in Aberdeen is built on brownfield sites in line with Aberdeen City and Shire Strategic Development Plan targets. However, both the Strategic Development Plan 2020 and the Proposed Local Development Plan Schedule 4 (Issue 2) on Housing Land acknowledge that brownfield sites cannot meet this allowance on their own. Greenfield sites are also required to ensure a continuing five-year effective supply throughout the lifetime of the Local Development Plan.

The site has been determined as suitable for development by the Council, the Councils planning judgement can be exercised differently to Planning Officers judgment.

More Suitable Alternatives

41, 585, 1169: The Proposed Local Development Plan at paragraph 3.6, page 22 acknowledges the importance of brownfield sites and considering them for development first. The Aberdeen City and Shire Strategic Development Plan 2020 states that new housing allocations should reuse brownfield land and attempt to utilise the current constrained supply in the first instance. The Proposed Local Development Plan endorses that approach and looks to ensure that at least 40% of all new housing in Aberdeen is built on brownfield sites in line with Aberdeen City and Shire Strategic Development Plan Targets. However, greenfield sites are also required to meet the Strategic Development Plan allocations as discussed in Issue 2: Housing Land. The site is considered suitable for both market and affordable houses. All developments over 5 homes have to provide affordable housing or a commuted sum towards affordable housing and the preference is towards on-site provision in accordance with Proposed Local

Development Plan Policy H5 - Affordable Housing. The modification to reduce the number of homes on the site is not supported.

Reports/Object to Procedure to Allocate Site

19, 20, 32, 592, 603, 717, 766, 778, 782, 808, 815, 820, 829, 947, 1034, 1061, 1156: The rationale for this site was explained verbally at a meeting of Full Council on 2nd March 2020. The site has been determined as suitable for development by the Council, the Councils planning judgement can be exercised differently to Planning Officers judgment. A call for representations on the Proposed Local Development Plan was advertised in the press and on social media. The requirement to hold this process is set in legislation and the time given is usually 6 weeks. Due to the current COVID situation the Council and Officers agreed to run the process for an additional 8 weeks. 17,000 letters were sent out to addresses 20 metres from the proposed zone sites as required by legislation under the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 (CD XX). Further details on the consultation process can be found in the Statement of Conformity with Participation Statement.

782,1061: The Strategic Environmental Assessment which accompanies the Proposed Local Development Plan at page 85 identifies that a Flood Risk Assessment would be required, along with Habitats Regulations Appraisal to accompany development proposals. On page 131 of the Strategic Environmental Assessment, it is considered that water abstraction associated with the opportunity sites identified in the Proposed Local Development Plan will not have an adverse effect on the River Dee Special Area of Conservation. At page 135 it is explained that it is not possible at the moment to assess site specific details of the effect of construction and that a project Habitats Regulations Appraisal and Construction Environmental Management Plan would be required. Appendix 2 of the Proposed Local Development Plan concludes that adverse effects on site integrity can be avoided in relation to potential construction impacts on the opportunity sites.

Any applicant would be required to demonstrate at planning application stage that there would be no significant adverse impact on the environment surrounding the site and will be required to adhere to Development Plan policies and the submission of any environmental surveys or assessments required as supporting justification for any development.

808: Field boundaries, minor roads and woodland boundaries will demarcate the site. In the context of other proposals at OP52, OP53 and OP109, it is considered appropriate for the village boundary to extend further north at this point .

General Area Strategy

20, 717, 820, 823: The site has been determined as suitable for development by the Council, the Councils planning judgement can be exercised differently to Planning Officers judgment.

Layout, Siting and Design

19, 603, 627, 717, 718, 766, 778, 794, 808, 815, 820, 821, 823, 826, 829, 844, 958, 1023, 1034, 1068, 603, 764, 718, 1068: If allocated, during assessment of any forthcoming planning application at the site that the layout, siting and design would be assessed. Any developer would be required to submit details to the Planning Authority on layout, siting

and design proposed. If allocated it will be at pre-application stage and assessment of any planning application which may come forward that the actual capacity of the site would be determined along with matters pertaining to details and impact on the threat to nature conservation, road infrastructure, school and medical facility capacity, landscape, proximity to community facilities and employment and design and layout and mix of housing etc.

888, 896: Design is at the forefront of development and Proposed Policy D1 - Quality Placemaking and Proposed Policy D4 - Landscape note this. The Council's Masterplanning, Design and Conservation Team and proposed Placemaking Technical Advice Note are discussed in Issue 24: Policies D1, D2 and D3: Design.

Infrastructure and Services

19, 20, 32, 33, 36, 585, 592, 603, 698, 718, 766, 774, 778, 782, 794, 808, 815, 820, 821, 823, 824, 826, 827, 829, 894, 947, 958, 1023, 1030, 1034, 1061, 1068: Any applicant at the planning application stage for a proposed residential development would be required to demonstrate through supporting information that there would not be a significant detrimental impact on infrastructure and services. The Council could seek developer contributions towards healthcare facilities to mitigate any potential impact upon services.

If allocated it will be at planning application stage that any applicant would be required to demonstrate there would be no significant adverse impact on the environment surrounding the site and will be required to adhere to relevant Development Plan policies and submission of any environmental surveys or assessments (including for flooding) required as supporting justification for any development.

Transport, Roads and Access

19, 20, 585, 603, 627, 698, 717, 718, 774, 778, 794, 808, 815, 820, 821, 823, 826, 827, 829, 844, 894, 958, 1023, 1030, 1034, 1061, 1068: If allocated it will be at planning applications stage that any applicant would be required to demonstrate through supporting information that there would not be a significant detrimental impact on roads infrastructure and safety. The Council could seek developer contributions towards any potential transport impacts and towards the creation or upgrading of Core Paths in accordance with the relevant policies in the Proposed Local Development Plan.

Sustainability

32, 698, 766, 774, 782, 808, 820, 821, 823, 824, 826, 827, 829, 844, 958: The Proposed Local Development Plan encourages sustainability throughout and at page 71, Proposed Policy R6, provides that all new buildings will be required to demonstrate a proportion of the carbon emissions reduction standard set by Scottish Building Standards will be met through the installation and operation of low and zero carbon generating technology. If allocated, it will be at planning application stage that any prospective developer of the site will have to show adherence to relevant sustainability policies in the Proposed Local Development Plan.

Green Belt

19, 20, 603, 627, 698, 774, 778, 794, 808, 815, 820, 821, 823, 826, 827, 829, 947, 958, 1023, 1034, 1061, 1068: There is already existing housing on three sides of the site with

no set pattern. The centre of the village providing facilities is close by, the current capacity at the school is able to accommodate the number proposed (CDXX School Roll Forecasts). We believe an enhanced landscape setting could be delivered which would balance out the rezoning from Green Belt and Green Space Network to residential. The site has been determined as suitable for development by the Council, the Councils planning judgement can be exercised differently to Planning Officers judgment.

Natural Environment

1, 19, 20, 32, 33, 36, 41, 585, 592, 603, 627, 698, 718, 766, 774, 794, 808, 815, 820, 821, 823, 827, 829, 894, 958, 1061, 1068: If allocated it will be at planning application stage that any applicant would be required to demonstrate there would be no significant adverse impact on the environment surrounding the site and will be required to adhere to relevant Development Plan policies and submission of any environmental surveys or assessments (including for flooding) required as supporting justification for any development.

1: The comment relating to an old tip and chemical dump relate to OP51 and are addressed under that site.

Policy Implications

603, 778, 782, 808, 820: Scottish Planning Policy paragraph 110 identifies the requirement to ensure there is a 'generous' supply of appropriate and effective land for the provision of a range of housing. The Council considers the allocation of this site will provide good choice and location for housing in the area. If allocated any prospective development will be assessed against the relevant policies in place at the time.

Miscellaneous Comments

769,782,782, 592, 778, 808, 820, 823, 826, 829, 1023, 1030, 1034: The Council considers the allocation of this site will provide good choice and location for housing in the area. If allocated any prospective development will be assessed against the relevant policies in place at the time. The site has been determined as suitable for development by the Council. Private land ownership issues (if any) are not material planning considerations. The Council amended the boundary to exclude some of the woodland on site and some areas more remote from Peterculter.

OP109 - Woodend

1114: Support for the allocation is noted and welcomed. The Council's position is that the site would offer 19 residential homes close to the City for employment opportunities but would have the character of living within a countryside setting. The provision of a relatively small number of homes at the site is considered to contribute to a choice for home buyers of a range of properties available within the Aberdeen City boundaries and to contribute to mobility in the housing market in this area.

109, 627, 794, 1017, 1061: The allocation was present in the extant Local Development Plan 2017 and consequently the principle of the allocation is considered to be well established.

Process

794: The site was included as a desirable site in the Development Options Assessment (CDXX) and was allocated in the extant Local Development Plan 2017.

Layout, Siting and Design

627, 794: At the present time there is no planning application or design brief for the site therefore specific questions regarding the character of the site proposal are unable to be answered at this time. There will be, in due course, more opportunities for the public to comment on this site when a planning application or design brief is lodged. Currently all comments regarding the layout and design of the proposed development have been noted. Any application proposal would be required to comply with the terms of Proposed Policy D1 – Quality Placemaking in terms of design and placemaking.

794: The Proposed Local Development Plan makes no reference to either site being 100% affordable housing but it is expected that both sites will contain an element of affordable housing in line with Proposed Policy H5.

Infrastructure and Services

627, 794, 1061: It is set out in Appendix 2 for OP109 that a Drainage Impact Assessment is required. This assessment will take into account any cumulative effects upon the drainage of the site. Proposed Policy NE4 – Our Water Environment states that development will not be supported if it increases the current and or future risk of flooding.

Traffic and Road Safety

627, 794, 1061: Concerns over traffic impact and access arrangements are noted, however this will be assessed and agreed as part of the planning application process, in consultation with the Council's Roads Project Team.

794: It is acknowledged that the site is relatively remote from the neighbourhood centre of Peterculter, main road linkages and bus routes. The proposed allocation is relatively modest in scale and offers an opportunity to support the existing businesses of Peterculter at a location which is well screened by woodland within the landscape.

794, 1061: Concerns over the suitability of footpaths are noted, however this will be assessed and agreed as part of the planning application process, in consultation with the Council's Roads Project Team.

Environment

627, 1061: A Strategic Environmental Assessment was undertaken for the site and the potential impacts upon local nature conservation sites and wildlife was taken into consideration. NatureScot were also consulted as part of the decision making process with regards the natural environment. Policy NE5 Trees and Woodland prevents development from resulting in the loss or damage to trees and woodlands. Appendix 2 sets out the requirement for a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee Special Area of Conservation and as part of this process it is likely a Construction Environmental Management Plan will also be required.

OP112 - West of Contlaw Road

38, 86, 234, 473, 489, 504, 505, 529, 551, 660, 833, 1014, 1156, 1163, 1168: The allocation was present in the extant Local Development Plan 2017 and consequently the principle of the allocation is considered to be well established.

Report/Process

234: The proposed allocation is for 10 homes at OP112.

234: The allocation was present in the Local Development Plan 2017 and consequently the principle of the allocation is considered to be well established. The site is surrounded to the west and south by established woodland which would preserve the landscape setting of Milltimber when viewed from the Aberdeen Western Peripheral Route. Development would result in the loss of greenfield land rather than public open space. An allocation for housing would be compatible with adjacent housing uses rather than bringing about specific residential amenity concerns. Any application proposal would be required to comply with the terms of Proposed Policy D1 – Quality Placemaking in terms of design and placemaking.

Planning Applications

1163, 1168: Proposed Policy H5 – Affordable Housing requires development proposals of five homes or more to contribute 25% provision of affordable units.

234: Concerns regarding traffic would be addressed during the planning application stage in consultation with the Council's Roads Project Team. It is noted that the existing planning permission at the site has satisfied the Council's Roads Project Team on this matter. Proposed Policy NE5 Trees and Woodland prevents development from resulting in the loss or damage to trees and woodlands. Any development proposal would be required to deliver suitable open space provision in line with Proposed Policy NE2 – Green and Blue Infrastructure.

Layout, Siting and Design

38, 551, 1014: A planning application (190409/DPP) (CDXX) was approved for this site in November 2019 for 30 houses and the site is currently being built out. Any subsequent applications which come forward for amendments to this agreed scheme under the new Plan period will be subject to consideration against Proposed Policy D1 – Quality Placemaking and Proposed Policy D2 - Amenity and such applications would be subject to public consultation.

660: Proposed Policy NE5 Trees and Woodland requires that development proposals should not result in the loss of trees or woodland. Proposed Policy D2 – Amenity requires developers to ensure that occupiers are afforded adequate levels of amenity in relation to noise, though the Aberdeen Western Peripheral Route is sufficiently separated from the housing to the east of Contlaw Road with or without the existing woodland.

Infrastructure and Services

38, 234, 473, 660, 1163, 1168: This is a well-established site. The expected number of units and pupils arising from this development have been accounted for in the School Roll

Forecasts (CDXX). The site is relatively remote from existing services however there is a bus stop within 600 metres of the site on North Deeside Road.

Traffic and Road Safety

234, 529, 551, 1163, 1168: Concerns over traffic impact and access arrangements are noted, however this will be assessed and agreed at planning application process, in consultation with the Council's Roads Project Team. The Roads Project Team are responsible for setting speed limits which is a separate process to planning.

1156, 1163, 1168: The closest Core Path to the site is the Deeside line approximately 600 metres to the south however there are footpaths into the adjacent woods and the site could provide opportunities for aspirational links. Though Culter House Road includes no pedestrian footpath, it is single vehicle width with clear straight sightlines.

Natural Environment

86, 234, 505, 529, 551, 660, 1163, 1168: A Strategic Environmental Assessment was undertaken for the site and the potential impacts upon protected woodland and wildlife were taken into consideration. NatureScot were also consulted as part of the decision-making process with regards the natural environment. Proposed Policy NE5 - Trees and Woodland prevents development from resulting in the loss or damage to trees and woodlands. Appendix 2 sets out the requirement for a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee Special Area of Conservation and as part of this process it is likely a Construction Environmental Management Plan will also be required. Arboricultural and ecological implication studies are also required for this site.

Miscellaneous Comments

86: Any ground works which have been undertaken and which require planning permission can be dealt with by the Planning Enforcement team and this does not preclude the site being allocated.

OP113 - Culter House Road

660, 1014, 1156, 1163, 1168: The allocation was present in the extant Local Development Plan 2017 and consequently the principle of the allocation is considered to be well established.

Planning Application

1163, 1168: Proposed Policy H5 - Affordable Housing requires housing developments of 5 homes or more to contribute no less than 25% of the total number of homes as affordable housing.

Traffic and Road Safety

1163, 1168: Concerns over traffic impact and access arrangements are noted, however this will be assessed and agreed as part of the planning application process, in consultation with the Council's Roads Project Team.

1156, 1163, 1168: There is direct access to the bus network 400 metres to the south west of the site. There are limited options with regards to local Core Paths. The allocation of eight houses is modest and would increase usership of the existing path network only slightly.

Layout, Siting and Design

660, 1014: An allocation for housing is viewed as compatible with adjacent residential use and would not bring about any significant concerns with regards to noise impacts. Nevertheless, Proposed Policy D2 – Amenity requires developers to ensure that occupiers are afforded adequate levels of amenity in relation to noise. The Aberdeen Western Peripheral Route is sufficiently separated from the site and removal of trees onsite would not likely give rise to any significant increase in noise from the bypass to existing houses.

Natural Environment

660, 1014, 1163, 1168: A Strategic Environmental Assessment was undertaken for the site and the potential impacts upon Local Nature Conservation Sites and wildlife was taken into consideration. NatureScot were also consulted as part of the decision making process with regards the natural environment. Policy NE5 Trees and Woodland prevents development from resulting in the loss or damage to trees and woodlands. Appendix 2 sets out the requirement for a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee Special Area of Conservation and as part of this process it is likely a Construction Environmental Management Plan will also be required.

Reporter's conclusions:

Reporter's recommendations:

Issue 12	ALTERNATIVE SITES: DEESIDE	
Development plan reference:	No reference in Plan	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Malcolm Ellice (131) Freia Henery (132) Steve Horton (133) John Andrew (160) Mrs Lesley MacLennan (169) AJC Homes (188) Debbie Mckay (206) Paul Dumont (226) Cathryn Duthie (230) Angela Bavidge (234) Daniela Brawley (235) Roger Mcilroy (240) Emma Sinclair (241) Ross Sinclair (243) Martin Gordon (246) John Bowie (249) John Neal (250) Ann Neal (251) Colin Wilson (254) Anthony Mckenna (259) Lucy McKenna (260) Richard Gravenstede (263) Alastair H. Hume (264) Irene Blackhall (265) Sam T McCulloch (272) Jamie Mellis (273) Susan Urban (275) Bill Mitchell (276) J. Patterson (277) Ann Smith (278) Lynne Wilson (279) Cameron Wilson (280) Karen Cranfield (281) Marilyn Stronach (282) Kerry Hobbs (283) Martin Smith (284) Elly McKay (285) David Mckay (286) Jonathon Milne (287) Mark Hobbs (288) Derek Smith (289) Leola Mitchell (290) Gavin Meechan (291)</p>		

Derek Mitchell (292)
Daniela Brawley (293)
Gavin Wilson (294)
Graham Wilson (295)
Andy Burnett (296)
Professor David Mannings (297)
Lisa Blacklaw (298)
Robert Lawson (299)
Vernon Metcalfe (300)
Kirsty Groseneill (301)
Ewan McRae (302)
David Alistair Wilson (303)
Anne Findlay (304)
Dr Bassam Alkari (305)
Dr Abir Alchikh (306)
Suzanne Blewett (307)
Richard and Kathleen Loose (308)
Andrew Brodie (309)
Alan Waters (310)
Trevor Grose (311)
Anne Seeley (312)
Joyce Barwick (313)
Alistair Soutar (314)
Eva Robertson (315)
Linda Mchattie (316)
John Eagles (317)
Alistair Findlater (318)
Greig Henderson (319)
Duncan Davidson (320)
David and Isobel Kennedy (321)
Douglas Kerr (322)
Eileen Smith (323)
Suzanne Harnden (324)
Susan Cooper (325)
Brian and Jess Gill (326)
Isabella Gauld (327)
Amber Savage (328)
Jennifer Clark (329)
Gordon Smith (330)
Brian Johnston (331)
Peter Forbes Howie (332)
Iain David Milroy (333)
Maureen Barrett (334)
James and Valerie Gardiner (335)
Dr Peter Howarth (336)
Ron Wadsworth (337)
James and Sarah Howlett (338)
Margaret Wadsworth (339)
Richard Ferro (340)
Niall Blacklaw (341)
Daryl Deveci (342)
Margaret Mackay (343)

Ian Sims (344)
Murray Clark (345)
Stuart Spreadborough (346)
Stan Skinner (347)
Richard and Ingrid Bickerton (348)
Freeland Freight Service (349)
Lewis Patterson (350)
Christine Rowley (351)
Kathleen Young (354)
Donald McNeill (355),
Residents of Craigdon Road/Craigbank area (356)
Janet Hosie (358)
Timothy Moulds (361)
Laura Taylor (363)
Sheila Sheils (365)
Jean Smith (366)
Martin Mweemba (367)
John Gray (368)
Alistair Anderson (369)
Nicola Watson (370)
Elspeth Horton (371)
Dionne Shearer (372)
Neil MacLeod (373)
Graham MacLennan (374)
David Payne (375)
Jennifer Markou (376)
Sumeet S. Aphale (377)
Victoria Presly (378)
Martyn Leighton (379)
Neil Gillies (381)
Mr and Mrs W Lints (382)
Dave Barwick (383)
Mukta S. Aphale (385)
Debbie Main (386)
Chris Bond (387)
Claire Foster (388)
Jill Sutherland (389)
Eric Lovie (390)
Marlene Dawson (391)
Jordan Jeffrey (392)
Susan Clark (396)
Karen Patience (397)
Mark Jones (398)
Christine Bond (399)
George and Alicia Cameron (400)
Rhona Magowan (401)
Graeme Smith (402)
Anna Phillips (403)
Mrs Rosalyn Henderson (404)
Benjamin Phillips (405)
Donald Phillips (406)
Dr Hatem Atta (407)

Janet Atta (408)
Ann McGeechan (409)
Mark Kerr (410)
Maureen Vlaar (411)
Thomas C and Elizabeth J MacDonald (413)
Marianne Colleran (414)
Maureen Masson (415)
Dr Patricia Anne Glover (416)
Anna-Felenka Phillips (417)
Alistair W. Oag (418)
Michael Christian Creary (419)
Rhiannon Fraser (420)
Alan Stokes (421)
Victoria Deveci (422)
Alex MacGill (423)
Carolyn Annand (424)
Alistair Annand (425)
Janette Kennedy (426)
Elizabeth Martin (430)
June Fraser (433)
Julie Duguid (434)
Tom Duguid (435)
Daniele Petrone (436)
Rhona Flin (437)
Dick Bird (438)
Carol Sinclair (439)
RCC Services UK Ltd (440)
I.K. Aalders (441)
Kim Lees (442)
Dr Marion Slater (443)
Fiona Urquhart (444)
Valerie A. Stephen (445)
Laura Stewart (446)
James McLean (447)
Luke Knights (448)
Ruth Hughson (449)
F. Watt (450)
James Stewart (451)
Rona Sedgwick (452)
Michael Sedgwick (453)
Dirk Nikodem (454)
Gail Hogg (455)
David Fisher (456)
Dr Susan Stokeld (457)
Philip Wood (458)
Emma Brown (459)
Melanie Forrester (460)
June Waters (461)
Kate Hogg (462)
Amanda Clark (463)
Mark Quantrill (464)
Jessica Quantrill (465)

Alex Quantrill (466)
Graham Forbes (469)
Martin Kirkham (470)
Gerry Macdonald (472)
Sandra Harkness (477)
Euan Harkness (478)
Mr and Mrs Nigel A. and Jane Prichard (479)
Sarah Henderson (480)
Caroline Wood (481)
Janet and John Park (482)
Martin Donachie (483)
Bethany Hogg (484)
Ian Dundas (485)
Lara Rishmani (486)
Mike Rowley (487)
Mr Nicole Dundas (488)
J Barrie Anderson (490)
J Jane Anderson (491)
Dr Moira Nikodem (492)
Donald Waters (493)
Hilda Millar (494)
Adele Bennett (498)
Mrs Alison Davies (502)
Elizabeth Stephenson (503)
Jane Stirling (504)
Robert Talbott (505)
Kathleen Jackson (507)
I and E Crisp (508)
Luba Shanks (510)
Suzanne Adams (511)
Henry Adams (512)
Lynne Freeland (514)
Robert Lawrence (515)
Alistair Geddes (517)
Angela Main (519)
Dr Matthew Donachie (520)
John Dalton (521)
Gareth Rennie (522)
Brenda Keith (525)
Bob Beattie (526)
Thelma Beattie (527)
Paul Slater (528)
Gillian Anderson (532)
Cults Property Development Company Ltd (534)
Nienke Mayo (535)
Malcolm Grant (541)
Alastair Moody (549)
Gareth Webster (550)
Adam Smith (553)
Fiona Lavery (556)
Constanza Celis (557)
Graham Donaldson (558)

Steven Bulter (559)
Graeme Masson (560)
Gwyn McIntosh (561)
Andrew Skinner (562)
Andrew Darcy-Evans (563)
Prof JS Bevan (564)
Karen Bell (566)
Clare Donachie (567)
Natalie Bell (568)
David Nugent (569)
Kirsty Harkness (573)
Scott Harkness (574)
Mr Dave Robb (575)
Dorothy McLellan (578)
Peter Watson (586)
Katie Baxter (587)
Elizabeth Milne (588)
Dr Robert Milne (589)
Graham Bell (593)
Lucy Glasgow (594)
Simon Merrett (595)
Robin Dyer (596)
Debra A. Merrett (597)
Fiona White (598)
Lyn Bell (600)
Fiona Binnie (604)
Tereza McPherson (612)
Ruth Ramseyer (613)
Nigel Williams (616)
Katherine Rutherford (638)
Denise Jackson (648)
Derek Robertson (657)
N Susan Roy (659)
Nigel Prichard (660)
Milltimber South residents (680)
Tom Stewart (681)
Bruce Masson (683)
J. Steve Martin (688)
Kathryn Wade (690)
Andrew Harrow (691)
Stuart Jackson (700)
Shenagh Walker (701)
Lucia Ruggione (703)
Duncan Balmer (704)
Graham Rettie (709)
Mrs J Ironside and Midstocket Development Company Ltd (712)
Paul Scott (715)
Diane Fincken (716)
Stewart Milne Homes (717)
David Richards (719)
Caireen McMillan (728)
Shell UK Limited (730)

Helen Slowey (732)
Douglas McMillan (733)
Andy and Jackie Kirk (734)
Mrs Ethel Robertson (736)
Sheila and Edward Joiner (738)
Ruth and Kenny Lyon (739)
Greg Davie (740)
Mr J. S. Cordiner (743)
Stewart Milne Homes (744)
Carrie Keys (745)
Culter Community Council (764)
A. Allan (765)
The Scott Family (769)
Margaret Ward (771)
Gail Pritchard (776)
Richard McDonald (784)
Mr S Malcolm (793)
John Jackson (812)
Valarie Johnstone (813)
Joe Johnstone (814)
Emma Gray (816)
Andy Gray (817)
Beverly Scott (830)
Susan Hepburn (832),
Cults, Bieldside and Milltimber Community Council (833)
Jennifer Ledingham (837)
Sandra Hutcheon (840)
R. Malcom (841)
W and M Donald (844)
Dr Nadim Dayoub (846)
George McAndrew (852)
Kaustuv Ghosh (857)
Holly Buchan (858)
Drum Property Group (859)
Bancon Homes (862)
Kerrie Tennant (863)
Brenda Conn (864)
Kevin Dalton (866)
Ailsa Wildgoose (867)
Bill Wood (869)
Camphill Estate (871)
Mrs Joan Webster (872)
Mrs. J Ironside and Midsocket Development Company Ltd (873)
Neil Curr (874)
Emma Wood (875)
Bancon Homes (889)
Joanne Manning (890)
Mrs S Buyers (893)
CALA Homes (North) Ltd (895)
George Batchelor (902)
Jennifer Batchelor (903)
Brian and Anne Duncan (904)

Pia Gordon (906)
 Peter Allan (908)
 Louise Craig (909)
 Alan Smith (911)
 Brian Conn (914)
 West Craigton Farm (915)
 Robert Gauld (918)
 Audrey Ireland (920)
 Woodaven Estates (926)
 Arron Finnie (946)
 Robert Hepburn (948)
 Paul Richardson (953)
 I and S Duncan (954)
 Francois Fouin (973)
 Gill Murray (1004)
 Bruce and Gillin Purdon (1017)
 Keith McPherson (1050)
 Ryse Hydrogen Limited (1091)
 Neal Still (1096)
 David Allison (1119)
 Robert Ruddiman (1131)
 Mike and Jackie Coutts (1138)
 Mrs Irene Cormack (1140)
 Iain Montgomery (1156)
 Norman Matthew (1160)
 Kayley MacLean (1162)
 Gordon Inglis (1163)
 Carmenza Inglis (1168)
 Adriana Scotland (1172)
 Miss K Diack (1182)
 Lauren Blacklaw (1186)

Provision of the development plan to which the issue relates:

Alternative sites in Deeside

Planning authority's summary of the representation(s):

General Strategy: Cults, Bielside and Milltimber

833: Overall support for the recommendations in updated Aberdeen City Council Development Options Assessment 2020 with minor exceptions. The current housing land allocations are adequate and no further major allocations are required. There is support for development on brownfield sites closer to the City Centre. Further development would lead to a loss of Green Belt and Green Space Network, which would impact on landscape value and recreational value. Continued encroachment could irreversibly damage the attractiveness of the area which would not be in developers' interests. Allowing further development would lead to coalescence of settlements and subsequent loss of settlements' identity. Several proposals would take the built area about the 90/95 metre contour line which has been widely recognised as a natural limit. Many proposals are far from facilities and public transport and would result in car dependent developments. There are concerns regarding the capacity of health and education services to meet additional

demand, and while developer contributions can fund physical enhancements, they cannot address lack staffing. There are concerned about potential development growth around Aberdeen Western Peripheral Route junctions which would lead to loss of green space and coalescence of settlements. The demography of the area demands smaller properties for retirement living with good access to facilities and public transport, yet there is a dominance of low density large detached residential proposals. General agreement with Local Development Plan Team regarding developer proposals in the Community Council area within Ward 9 Deeside.

General Strategy: Milltimber

133: Support the position of no development on the floodplain in Milltimber, south of the Old Railway Line and bounded by the Aberdeen Western Peripheral Route. The area has been subject to proposals in the past. The area is floodplain, it floods extensively most winters, is it Green Belt and is unsuitable for development, the areas is key to the visual amenity for residents, commuters and tourists. Local infrastructure could not support development (roads, school, sewage and public transport), there would be a material increase in traffic levels and noise, exacerbating road safety concerns for cyclists and pedestrians, the valley setting and beauty is highly regarded by residents, commuters and tourists.

265, 299, 366, 388, 657: There has been loss of Green Belt due to significant development in the area through housing allocations and the completion of the Aberdeen Western Peripheral Route.

PITFODELS

Bid Site B0912 - Craigton Road South 1

833: Object to development proposal. The proposal is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing allocation target, nor does it meet Policy H3 density policy requirement. The site is Green Belt, Green Space Network and in the Pitfodels Conservation Area and development increases risk of coalescence between settlements.

859: The site should be allocated for 70 – 75 new homes in the Proposed Local Development Plan. The allocation is required to meet the housing allowances of the Aberdeen City and Shire Strategic Development Plan 2020. The development fits well within this section of the Conservation Area where the character has been modified by existing and approved development. Onsite natural and built heritage elements will be retained as far as possible, and access through the site will be formalised. Green Space Network does not rule out development.

Bid Site B0913 - Craigton Road South (2)

833: The site is undesirable for following reasons. The site is Green Belt, Green Space Network and in the Pitfodels Conservation Area and development increases risk of coalescence between settlements.

859: Site should be allocated for 30 new homes in the Proposed Local Development Plan. The allocation is required to meet the housing allowances of the Aberdeen City and Shire Strategic Development Plan 2020. The development fits well within this section of the conservation area where the character has been modified by existing and approved development, onsite natural and built heritage elements will be retained as far as possible, and access through the site will be formalised. Green Space Network does not rule out development.

Bid Site B0914 - Craigton Road South (3)

833: The site is undesirable for following reasons. The site is Green Belt, Green Space Network and in the Pitfodels Conservation Area and development increases risk of coalescence between settlements.

859: Site should be allocated in the Proposed Local Development Plan for a mix of community commercial uses and proposes a garden centres and childcare nursery. The development fits well within this section of the conservation area where the character has been modified by existing and approved development, onsite natural and built heritage elements will be retained as far as possible, and access through the site will be formalised. Green Space Network does not rule out development.

Bid Site B0917 - Land East of Inchgarth Mews

769: Respondent seeks zoning of land as a residential proposal for approximately 15 homes with associated North-South green links. Green Belt and Green Space Network designations do not preclude development. The site has good connectivity to services and facilities, natural and built elements on site can be retained. The site will have very little local impact, will share infrastructure with neighbouring approved development to the north, will enhance the Green Space Network and connectivity, fits with the new context of the area set by the neighbouring approved development to the north.

833: The site is undesirable. The site is zoned as Green Belt, and the River Dee Corridor Local Nature Conservation Site is close. Development would impact on surrounding landscape. The proposal would only partially relate to Cults and would add traffic load. This area is a clear green gap and helps maintain separate identities of Cults and Aberdeen and overall landscape setting of city. Education capacity an issue. The site does not meet Policy H3 density policy requirements.

Bid Site B0944 - Inchgarth Road

160: Site has been deemed undesirable yet planning permission has been granted.

534, 833: Support proposal for retirement-friendly housing, care home and link road between North Deeside Road and Inchgarth Road. Aberdeen City Council Planning Development Management decided at meeting in 2020 that they were minded to grant planning permission in principle (181224/PPP) subject to conditions. Pending Conditions being met the site should be included in the Proposed Local Development Plan. Zone as

an Opportunity Site suitable for residential development for the retired/elderly and a care home along with ancillary retail community use and open space.

Bid Site B0923 - Hillhead of Pitfodels

833: Object to development proposal. Agree with exclusion of proposal from the Aberdeen Local Development Plan. The proposal is not required to meet Aberdeen City and Shire Strategic Development Plan 2020 housing allocation requirements, and there is an education capacity issue. The site is located within Green Belt, and is currently in recreational use as appropriate for Green Belt. The site is not well connected to services/facilities thus car dependency. The Green Belt role is justified and appropriate. Site would remove valuable green space causing coalescence between settlements with detrimental impact on landscape and on the separate identities of settlements.

Bid Site B0936 - Treespark 1

833: The site is undesirable. It is not required to meet Aberdeen City and Shire Strategic Development Plan 2020 housing allocation target. The proposal does not meet Policy H3 density policy requirements. The site is zoned as Green Belt, and it provides separation between Cults and other settlements to east, therefore development may risk of coalescence.

Bid Site B0937 - Treespark 2

833: The site is undesirable. It is not required to meet Aberdeen City and Shire Strategic Development Plan 2020 housing allocation target. The proposal does not meet Policy H3 density policy requirements. The site is zoned as Green Belt, and it provides separation between Cults and other settlements to east, therefore development may risk of coalescence.

CULTS

Bid Site B0910 - Friarsfield North

356, 600, 833: Supports the non-allocation of the site. The proposal is not needed to meet housing allocations required by the Aberdeen City and Shire Strategic Development Plan 2020 and is contrary to the Strategic Development Plan as it is an extension to the existing Friarsfield Masterplanned development. The site is in Green Belt and acts as backdrop to existing development at Friarsfield and Aberdeen. There is a risk of coalescence as its location serves to maintain the separate identities of Cults, Countesswells and Aberdeen. Development will result in the loss or disturbance of wildlife or species, and landscape features, and development will intrude into the surrounding landscape as the site would be highly visible from the south. Settlements along Deeside are contained within the 90 metre contour line and this development would be beyond this. The site is poorly located for public transport and community facilities resulting in car dependency. Education and healthcare capacity issues need to be addressed before any more homes are built in the area. Recent rainfall events (August 2020) raise questions about existing surface water drainage capacity on the Friarsfield development and downstream in Cults. Further

development would add to the surface water load. There are concerns regarding the non-delivery of affordable housing, developer obligations, and low and zero carbon technology, as well as housing mix. The proposal would not meet Policy H3 density policy requirements and it should be excluded from the Proposed Local Development Plan. The site is contrary to a number of international, national and local policies on biodiversity.

895: Allocate Bid Site B0910 for 280 residential units. The site is compliant with the Aberdeen City and Shire Strategic Development Plan 2020, would meet the requirement for additional housing, and would help to ensure that there are a range of sites across the City in various locations, which are able available to meet housing delivery in Aberdeen. Development will provide a defensible Green Belt boundary as the site is not required for Green Belt purposes and has limited landscape impact. The site was previously allocated in the Aberdeen Local Plan 2004 and the principle of development has therefore previously been established. Development in this location will make best use of existing resources as there is new infrastructure with capacity, is in a sustainable location close to a neighbourhood centre and offers great connectivity for walking/cycling with the existing core path network.

Bid Site B0915 - Land at Sunnyside, Cults

769: A small scale extension to OP41 for residential zoning and, if need be, including a Green Space Network zoning to the western edge is proposed. The allocation would help to strengthen the Green Belt boundary to the west. The recent planning application by CALA (200171/DPP) has strengthened the suggestion that this small site could be a valuable extension to the OP41 site and provide setting, open space and land/water management opportunities to the Cults Burn that could assist in the delivery of the OP41 allocation.

833: Agree with Officer recommendation of undesirable. The site sits at edge of OP41 Friarsfield, and the woodland forms a strong and defensible Green Belt boundary. Whilst small, the development would erode these features.

Bid Site B0919 - Land at Craigton Road

833: The site is undesirable. The site is Green Belt. The development is not required to meet Aberdeen City and Shire Strategic Development Plan 2020 housing allocation targets. The proposal does not meet Policy H3 density policy requirements. The site is part of an area which serves to maintain the separate identities of Cults, Countesswells and Aberdeen so development will increase the risk of coalescence. Development will have impacts on landscape and would be visible from the south. It sits above 90 metre contour line. The site would be car dependent and due to its size would not encourage additional community facilities. Education capacity issues also noted.

Bid Site B0924 - Loirsbank

833: Object to development proposal. Strongly oppose inclusion of proposal in the Proposed Local Development Plan. Although a small site the SEPA flood maps show the site is medium-high risk of river flooding and is closer to flood margin than previous

development (Application Reference 101384) to the east. Drainage is an issue. Development on the site would have significant impact on landscape due to proximity to River Dee and open aspect. Land raising/remedial works would be required to mitigate flood risk. Completion of previous development south of Loirsbank Road does not justify further development on a vulnerable area – the site in question was approved contrary to Officers with a heavily caveated response from SEPA.

Bid Site B0931 - Friarsfield Woodley

833: The site is undesirable. The proposal is unnecessary, access arrangements to the Friarsfield development are set out in the Friarsfield Development Framework and there is no need to depart from this.

Bid Site B0949 - Friarsfield Sunnyside

833: The site is undesirable. It is not required to meet Aberdeen City and Shire Strategic Development Plan 2020 housing allocation target, and is an extension to a Masterplan area. Development would increase coalescence between Countesswells and Cults, and it will breach the 90 metre contour line. There will be a further load on education and health facilities.

MILLTIMBER

Bid Site B0901 - Culter House Road

470, 833: Support the undesirable designation, and development should be denied.

833, 1163, 1168: There are concerns regarding biodiversity loss, destruction of habitats and reduction in Green Space Network. The site is Ancient Woodland. The site is close to the Aberdeen Western Peripheral Route and conflicts with the Main Issues Report to avoid development in these locations. There is a risk of coalescence. The site is far from facilities, services and public transport so will be car dependent. Extra traffic will be generated on Culter House Road. Development will impact on access to recreational and wellbeing opportunities. There will be a visual impact on landscape and does not meet Policy H3 minimum density. There is a lack of capacity at the local Academy and a lack of demand for additional housing due to economic downturn. It is unknown if the requirement for 25% affordable units would be delivered on the site.

188: Site should be allocated for eight houses. The landscape and Ancient Woodland designations are not a barrier to development. There are similar sized developments in proximity (OP112 and OP113) therefore the principle of development has been established in this area. Public transport and active travel are available. The limited nature conservation is not a barrier as is outlined in the Reporter's Report to OP113. The site accord with the Aberdeen City and Shire Strategic Development Plan 2020, and is small scale which offers a mix of size and tenures.

Bid Site B0905 - East Lodge, Culter House Road

575: Objection to failure to identify as an Opportunity Site for residential development of up to five dwellings. The scale of allocation would pose no conflict with allowances set by Aberdeen City and Shire Strategic Development Plan 2020. The site forms a logical infill site, being adjacent to existing residential properties and other housing allocations. Green Belt and Green Space Network designation on site are no longer fit for purposes given the significant changes incurred via the Aberdeen Western Peripheral Route which acts as a new physical boundary between Milltimber and Peterculter - as such there would be no coalescence, nor impact on established green network; the site has been cut off from those to the north. Green Belt, Green Space Network and Ancient Woodland designations have not precluded allocation of Opportunity Sites to the north east of the site. The site is within walking distance of public transport and sustainable transport options, amenities and other settlements along Deeside in addition to strategic links via the Aberdeen Western Peripheral Route to employment areas. Development would contribute to established mix of housing. In the context of shortfall of units to be met through new allocations per the Aberdeen City and Shire Strategic Development Plan, the site is promoted for inclusion within the Proposed Local Development Plan.

470, 833, 1163, 1168: Development should be denied. The development is undesirable as it contains Ancient Woodland (felled) and there are concerns regarding biodiversity loss, destruction of habitats and reduction in Green Space Network. Development will impact on access to places for walking/cycling and running. There is a lack of demand for additional housing, and there is concern affordable housing will not be delivered. It is close to the Aberdeen Western Peripheral Route, and there is a risk of coalescence. The site is far from community and education facilities and public transport so will be car-dependent and generate extra traffic. The type and density of housing is out of character for the area - suggests one unit on the site may be acceptable. The development does not meet Policy H3 minimum density.

Bid Site B0906 - Contlaw

234, 325, 470, 659, 833: Object to the development proposal, and support the non-allocation of the site, and the continued Green Belt zoning. The development is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing land allocation requirements. There is a need to protect open space, the character of Deeside and rural land from further development. The site would represent substantial extension to Milltimber - above the 90 metre contour in an exposed location. The road infrastructure would require to be updated. The site would lead to a loss of, and intrusion on, the leisure amenity in the area. There is sufficient housing in the area and the market is saturated. Recognise the proposal is to provide a primary school, shopping and community facilities, yet the timing of provision is a concern and residents will be car dependency until these are provided. There is a lack of confidence in ability to provide public transport services to the "transport interchange". Despite provision of a primary school there would be additional strain on secondary education, healthcare and other services.

744: Object to the non-allocation of the site. Site should be identified for a phased residential led mixed use development comprising 800 housing units, land for Class 4 (Business) and Class 5 (General Industrial) use, a primary school (if required), community

and health facilities, and a mixed use centre incorporating retail and hospitality spaces as well as a transport interchange. Infrastructure, open space and strategic landscaping will be provided. The site will provide a better mix of development to Milltimber. There will be no visual or physical harm to the landscape setting and identity of Milltimber, as the site is visually contained due to woodland and vegetation, and topography. Officers' assessment of the site fails to consider the urbanising effect of the Aberdeen Western Peripheral Route which has changed the character of the area, significantly altered the landscape and will provide a well-defined physical boundary to the west of Milltimber, acting as a barrier to coalescent between Milltimber and Peterculter. The Aberdeen Western Peripheral Route has created new opportunities for suitable settlements to link with the interchanges along its route, including introducing a north south public transport link, and remove ribbon style development along the east – west axis. Flooding and capacity constraints at Cults Academy are not an impediment to development and capacity could be increased through developer contributions. The site should be allocated to ensure a five-year Housing Land Supply is in place at the end of the Proposed Local Development Plan period.

Bid Site B0909 - Pineacres

660, 833: The site is undesirable and should be rejected. This would result in a loss of Green Belt between Aberdeen Western Peripheral Route and Milltimber, and a loss of woodland, which acts as a noise barrier and air filter to the Aberdeen Western Peripheral Route. The proposed density is not in keeping with Culter House Road. There are concerns at potential integration with OP112, however if OP112 proceeds there is less concern as site is rezoned as residential. Proposal would add traffic load onto Contlaw Road. Development would remove a recreational area and would lead to a negative impact on protected species and their habitat. There is no requirement for more housing at Milltimber.

743: Site was subject to a development bid for 12 residential units. The Main Issues Report recognised the site should be rezoned to residential land use with Green Space Network remaining. Support the zoning change and welcome the residential allocation. It is not agreed the Green Space Network zoning should be retained. The site is surrounded by residential development and Green Space Network will be isolated and no longer consistent with the surrounding area. This development can be accommodated without compromising wildlife, tree belts, woodland and biodiversity. Redevelopment would be considered under a range of policies within the Proposed Local Development Plan. There are surrounding allocated sites (OP112) with long established woodland and Tree Preservation Order 250. The principle of development is accepted in this area without Green Space Network. The site offers good accessibility with a variety of community services and facility within 2 kilometres (community centre and shops; 400 metres from a bus stop and connected to core path network). OP112 sets the principles of development in this area. Pineacres should be treated in the same way. The site is close to the Aberdeen Western Peripheral Route so provides good north and south connections. This makes the site in line with Scottish Planning Policy where sites should be directed to the right places and housing should be coordinated with infrastructure.

Bid Site B0927 - Contlaw Road

833: Conditional support for the site. The site is subject to planning application 190409 for 30 houses. Respondent makes reference to a letter from 03 April 2019 (not included in representation).

1163, 1168: Development will result in biodiversity loss, destruction of habitats and reduction in Green Space Network. The development is remote from services and employment opportunities therefore will result in increased car use. There is a lack of capacity at the local Academy and a lack of demand for additional housing due to economic downturn. The development will impact on access to places for walking/cycling and running. Query whether the requirement for 25% affordable units would actually be delivered on the site.

Bid Site B0939 - Peterculter East 1

833: Object to development proposals. Agree with exclusion of proposal from the Aberdeen Local Development Plan. The site is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing allocation target and would not conform to Policy D3 density policy requirements. The area is valued Green Belt /green space and contains archaeological interest. Proposal would detract from semi-rural feel of Deeside Way. The proximity to the Aberdeen Western Peripheral Route and A93/B979 junction conflicts with Main Issues Report stipulations on development along the Aberdeen Western Peripheral Route. Development would impact negatively on residents of Camphill School during and after construction. SEPA flood maps identify a medium risk of flooding and the site is understood to have flooded during Storm Frank. There is a risk of coalescence between Milltimber and Culter. The capacity of education and healthcare are issues.

862: The site should be included in the Proposed Local Development Plan. Development of the site would enable improved landscaping, improve open space and provide a greater housing mix amongst other benefits. Do not agree with the Council's assessments of the bid site relating to drainage, natural conservation and landscape fit. OP46 was not considered desirable by Officers for allocation, the decision to allocate OP46 is illogical. This site is more suitable and deliverable than OP46.

Bid Site B0942 - Milltimber South and Former OP114 and Application Reference 200535/PPP

131, 132, 133, 169, 206, 226, 230, 235, 240, 243, 250, 251, 254, 260, 264, 272, 273, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 312, 313, 314, 315, 316, 317, 318, 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, 351, 354, 355, 358, 361, 363, 366, 367, 368, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 381, 382, 383, 385, 386, 387, 388, 389, 390, 391, 392, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 430, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 469, 472, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488,

490, 491, 492, 493, 494, 502, 503, 504, 505, 507, 510, 511, 512, 514, 515, 517, 519, 520, 521, 522, 525, 526, 527, 528, 532, 535, 549, 550, 553, 556, 557, 558, 559, 560, 561, 562, 563, 564, 566, 567, 568, 569, 573, 574, 578, 586, 587, 588, 589, 593, 594, 595, 596, 597, 598, 604, 612, 616, 638, 648, 657, 659, 680, 683, 688, 691, 701, 703, 704, 709, 715, 716, 719, 728, 732, 733, 734, 736, 738, 739, 740, 764, 765, 771, 776, 793, 813, 814, 816, 817, 830, 832, 833, 837, 840, 841, 846, 852, 857, 858, 863, 864, 866, 867, 869, 872, 874, 875, 890, 902, 903, 904, 906, 908, 909, 911, 914, 918, 920, 948, 973, 1004, 1017, 1050, 1119, 1160, 1191, 1138, 1156, 1172, 1186: Support Green Belt zoning

648, 680, 1138, 1140: Objects to Bid B0942 to increase housing capacity of Former OP114 to 90 units and include retail/employment uses on the site.

The Need for Further Housing Development

206, 241, 246, 263, 289, 311, 312, 315, 351, 355, 361, 366, 514, 541, 613, 638, 659, 680, 736, 906, 973, 1172: There is no longer a housing shortfall, therefore there is no need, demand or requirement for further housing. There is sufficient housing in Milltimber through existing allocations. The current economic climate of the North East has reduced the need for further development. There are too many houses being built and these are not being sold. There needs to be more control of housing development on the local community. Opposes the development on this basis. New houses may be needed, but the area is becoming overdeveloped. There are other less intrusive sites available for residential development including brownfield and city centre locations.

The Need for Non-Residential Development

355, 361, 517, 613, 680, 690, 745, 833, 973: The need and demand for retail in the area in questioned. There is adequate retail in Culter, Bielside and Cults. Retail development on this site will have a negative impact on existing businesses. The retail proposals would create additional traffic movements including HGVs. This would adversely affect the amenity and character of Milltimber.

Health and Wellbeing and Recreation and Community Impact

132, 240, 265, 299, 346, 354, 370, 388, 399, 541, 691, 719, 734: The area is used for health, recreation and wellbeing. Development of the site will lead to a detrimental impact on health and wellbeing for residents. The recent experiences from COVID-19 pandemic highlights the benefits of encouraging natural habitat and restricting urban growth. There will also be damage to recreation on the Deeside Line.

Retain the Green Space

133, 206, 240, 241, 243, 246, 249, 265, 283, 326, 351, 355, 361, 381, 372, 573, 613, 659, 700, 733, 833, 1162, 1172: Retuning the site as Green Belt will benefit the community enormously and will prevent the loss of valued green space. It is critical that the Green Belt is reinstated, for the sake of wildlife, local community and environment. Development will have a detrimental impact on the Green Belt. This is one of the last remaining green spaces and needs to be retained. Green spaces need to be protected and maintained for

future generations to ensure a positive impact on climate change. The area offers significant beauty, environmental and social value and should not be developed. The loss of green areas will impact on amenity and enjoyment of the area for existing residents. The proposal does not comply with Policies NE1 and H1 as it would erode the character of the Green Space Network and result in loss of valued area of open space. The site has an environmental benefit for the community. It is necessary to preserve the natural environment around the city and Aberdeen should revert to being a 'garden city'.

Landscape Character and Setting, and the Natural Environment

131, 132, 133, 241, 249, 263, 264, 265, 308, 351, 354, 377, 512, 517, 522, 558, 574, 657, 659, 680, 719, 864, 690, 745, 833, 906, 973, 1162, 1182: The area is a natural belt of farmland that is important to the Dee Valley and Aberdeen city. Developing the site will negatively affect the Dee Valley setting and the character of Milltimber and the wider area. Development would destroy one of the few remaining areas of green space along North Deeside Road resulting in unbroken development along the entire corridor. The site is an area of tranquillity and natural scenic beauty, afforded by the Deeside Valley. There are concerns about loss of, or compromise of views across the Dee Valley for residents, tourist and those travelling along the North Deeside Road, and concerns are raised regarding urban sprawl from Milltimber towards Aberdeen. The Aberdeen Western Peripheral Route has had very little impact on the landscape.

132, 265, 299, 377, 399, 514, 574, 594, 690, 691, 832: Development will result in a negative impact on natural heritage, wildlife, protected species and the environment, including the loss of habitat and wild animals, and a negative impact on trees and fauna. There are a number of species on site and these are protected by the Nature Conservation (Scotland) Act 2004, The Deer (Scotland) Act 1996, and the EU Birds Directive, adopted 02 April 1979. There are concern that developments are not assessed fully for environmental impact; a recent development has resulted in damage to a protect species habitat and orchid field in the local area.

Development in Area

265, 289, 299, 354, 355, 367, 388: Not allocating the site will ensure the area recovers after the construction of the Aberdeen Western Peripheral Route. Too much development has taken place already and the community has experienced enough disruption due to previous development. There has been a loss of Green Belt, recreation routes and play areas due to significant housing and transport infrastructure projects such as the housing allocations at Oldfold and Contlaw Road, and the completion of the Aberdeen Western Peripheral Route.

691: Construction would cause dust, noise and general disturbance.

1162: The housing proposal has no benefits to the current residents; the housing will be beyond the budget of the majority and will profit from access to communication infrastructure to beyond the scope of the existing residents.

Infrastructure and Capacity

133, 289, 311, 371, 399, 503, 514, 517, 594, 613, 680, 719, 745, 833, 906, 1162: The location is unsuitable for development due to local infrastructure capacity issues, including schools, health care, GPs and dentist, roads, sewage, and public transport. Developer contributions can only partly mitigate health care provision as they cannot provide staffing. There will be an increase in traffic levels, pollution and noise resulting in concerns over road safety for pedestrians and cyclists. Better public transport is required via a road overhaul. Entry to recreation is constrained due to a lack of safe access point onto the Deeside Line.

General Comments

680: The scores given in the Development Options Assessment relating to drainage and floor risk, natural conservation, landscape features/fit, land use mix should each be reduced by 1 mark due to onsite flooding, the wealth of nature on site, the poor relationship with landscape setting and the removal of the retail use as per bid B0942

833: There is concern the site will be cleared and left unused if demand for housing was to reduce; this would be unacceptable.

Allocation of Site in the extant Local Development Plan 2017

889: The original allocation was as a result of the Report of Examination into the extant Local Development Plan 2017.

833: Object to development proposals. The Reporter's recommendations from the Examination into the extant Local Development Plan 2017 have to be revisited given the change in economy and impact on market demand for more houses in the area. In 2016 the Reporter, was seeking additional allocations, but the proposal is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 or Proposed Local Development Plan housing allocation targets. The proposal now has no retail/commercial facility and has increased the number of units to 90 homes, this may impede landscape views further and density is out of keeping with area. The increase in unit number may invalidates the recommendations made by the Reporters into the examination of the extant Local Development Plan 2017.

973: There was a lack of transparent and consultation surrounding the allocation of the site in the extant Local Development Plan 2017.

Planning Application

131, 305, 306, 470: All planning permission submitted previously should become void and no further application be accepted. Development should be (or should remain) denied.

464, 465, 466 strongly object to the planning application.

648, 700: Support the refusal of the current proposal (200535/PPP).

833: The planning application represented a departure from the adopted Aberdeen Local Development Plan 2017.

131, 638, 719: Most people are against the site. The recent application received over 800 objections which shows local opposition.

Objection to Removal of Former OP114

889: Objects to Former OP114's removal from the Proposed Aberdeen Local Development Plan and questions the merits of the allocation of other sites which are asserted to be less desirable in comparison. The sites continued inclusion in the Proposed Local Development Plan would provide a range and mix of housing, it aligns with the principles of the Aberdeen City and Shire Strategic Development Plan 2020, the Proposed Local Development Plan's policies on density and housing mix, and responds to retail need. The Officer's recommendation of an allocation of 60 homes at OP114 (before removal by Members) was not a cap on the number of homes which could be delivered on the site. The development industry have reservations about housing land in the Proposed Local Development Plan and therefore Former OP114 should be allocated, to align with both Scottish Planning Policy and the housing allowances of the Strategic Development Plan. There is no stated justification within the Full Council Minute as to why the site should be deleted. The reasons provided at by Elected Members when considering the removal of OP114 from the Proposed Local Development Plan can be rebutted – impact on education capacity can be met by planning obligations, local utilities have been assessed and there are no issues that could constraint development, there is a market for retail as is supported by the Retail Statement, and the site has previously been Examined as part of the extant Local Development Plan 2017. Other sites were included for allocation in the Proposed Local Development Plan in response to the Report of Examination into the Aberdeen City and Shire Strategic Development Plan 2020 (for example as OP12 - Silverburn House and OP2 - Cloverhill).

Bid Site B0943 - Milltimber Farm

470, 833: Object to development proposal. Agree with exclusion of proposal from the Proposed Local Development Plan. The proposal is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing allocation targets and does not meet Policy H3 density policy requirements. The site is Green Belt and Green Space Network and the last area of unbuilt land between Milltimber and Culter south of the A93. The proposal conflicts with intent of Main Issues Report to maintain green space between settlements and avoid development close to Aberdeen Western Peripheral Route. The SEPA flood map suggests risk of surface water flooding. Land should be reserved for a possible roundabout provision should the existing signalised junction design at A93/B979/ Aberdeen Western Peripheral Route junction proves unviable. Education and healthcare capacity are concerns.

862: The site should be included in the Proposal Local Development Plan for circa 70 units. Development of the site would make up the housing shortfall, enable improved landscaping, improved open space and greater housing mix amongst other benefits. The

site fits well into the landscape, is not remote from existing settlements and will not impact on the Dee Valley.

Bid Site B0947 - Binghill House (Application Reference 200750/PPP)

131, 169, 250, 251, 265, 272, 273, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 297, 298, 300, 301, 302, 303, 304, 305, 306, 307, 309, 310, 311, 313, 314, 315, 316, 317, 318, 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, 358, 366, 367, 368, 369, 371, 372, 373, 374, 375, 378, 379, 382, 383, 386, 388, 389, 391, 392, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 433, 434, 435, 436, 437, 438, 439, 440, 441, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 462, 469, 472, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 488, 490, 491, 492, 502, 503, 505, 507, 510, 511, 512, 515, 517, 519, 520, 521, 522, 525, 526, 527, 528, 553, 556, 557, 559, 560, 561, 562, 563, 564, 566, 567, 568, 578, 586, 587, 588, 589, 593, 594, 595, 596, 597, 598, 604, 612, 616, 648, 657, 683, 709, 715, 716, 719, 728, 732, 733, 736, 738, 739, 740, 765, 771, 776, 793, 813, 814, 816, 817, 830, 832, 837, 840, 841, 846, 852, 857, 858, 863, 864, 866, 867, 904, 908, 911, 914, 920, 1017, 1050, 1186: Support Green Belt zoning

Planning Application (Reference 200750/PPP)

234, 305, 306, 648, 514, 700, 1050: Object to the planning application and any development on site. Support the refusal of the application.

The Need for Further Housing and Further Development

311, 514, 613, 736, 793, 833, 841: Development will have negative impact on the local housing market. There is no strategic need for housing on this site, or for housing for the elderly, or retail element.

Green Belt and Green Space

265, 283, 299, 326, 346, 372, 388, 613, 700, 733, 734, 793: Retain site as a green space with Green Belt and Green Space Network. The area is of great benefit to the local community due to recreational, health and wellbeing opportunities it offers. Development will impact on the Green Belt, on the identify of Milltimber and on the buffer the Green Belt and woodland provides to prevent coalescence.

Natural Environment, Landscape Character and Setting

265, 289, 299, 311, 514, 522, 594, 657, 733, 793, 841: Development will impact on the environment resulting in the loss of natural habitat and disturbance to wildlife. The site is an area of tranquillity and natural scenic beauty, with landscape value that maintains the setting of the city due to its location. The area needs to recover after the development of the Aberdeen Western Peripheral Route.

Impact on Infrastructure, and Access to Services and Facilities

311, 503, 514, 594, 613, 793, 841: Development would have a detrimental impact on local community, as there is existing strain on infrastructure, including roads, schools and health care, which are not able to cope with more demand. The site is also remote from services and facilities, being located up a steep and narrow hill, with poor access to public transport. There is concern this will increase the volume of traffic on the road, and lead to safety concerns with children accessing the new primary school.

Support

598: Cults, Bielside and Milltimber Community Council should not have supported the application. It is not representative of Milltimber.

833, 864: The site has some limitations. However, it offers a specialised active retirement community with continuing care available on site. It meets the ambitions of the Community Plan. At time of response planning permission in principle (Application Reference 200750) is under consideration by Aberdeen City Council. Conditional support is given.

893: The site is suitable for future development of a retirement community comprising assisted and independent living units, conversion of Bingham House, café/ shop use and associated amenity. The site is free from constraints, viable and deliverable. A Bid for the site was submitted at Main Issues Report stage and an application for Planning Permission in Principle is currently pending determination. Bingham House is a private residential property and garden in a residential area, it is inappropriately zoned as Green Belt / Green Space Network. The land is not required to protect the character, landscape setting and identity of Aberdeen, and the site is ideally suited to accommodate further limited growth in a Milltimber. The proposed development will fit well within the landscape setting of Milltimber and Bingham House and garden. It is substantially screened by trees and will have no visual impact on the surrounding setting of Milltimber and the wider Dee Valley. Allocating the site as residential (restricted to over 60s) would reflect the nature of the site and the surrounding area, would not impact the purpose of the Green Belt and would support the development of a unique and much needed senior living development. Elements of the proposed use could be open to the public, e.g. a local shop and café. The proposed new retirement community is entirely in line with national policy and the City Council's Housing Need and Demand Assessment which identify a local requirement for new accommodation to serve the ageing population. Aberdeen City has an established need for age-specific housing reflecting the needs of its growing ageing population. Milltimber has a higher rate of older residents compared to the City as a whole. Retirement living is one of the key requirements in the Community Plan produced by the Cults Bielside and Milltimber Community Council, and the Community Council welcome the proposals for this site.

Bid Site B0907 - Albyn Playing Fields

833: Object to development proposal. Site is unsuitable for development. Development is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing land allocation requirements. The proposal would result in significant loss of

Green Belt and its current use is green space. There is a risk of coalescence. The proximity to the Aberdeen Western Peripheral Route would increase traffic movement, and this is contrary to the aims of the Main Issues Report. Queries whether the site can be redeveloped as it is currently Albyn Schools sports facility. The proposal may be more acceptable if it was for 100% affordable housing.

Bid Site B0920 - Binghill Farm

131, 259, 260, 470, 648, 700, 719, 833: Object to the proposal and support the undesirable designation, and the site should remain as Green Belt / Green Space Network. The site is not required to meet the housing requirements of the Aberdeen City and Shire Strategic Development Plan 2020 and there is no further demand for housing in the area as is evidenced by the slow build out rate in existing sites. Development would result in the loss of habitat resulting in a harm to, and loss of wildlife including protected species. The site would breach the 95 metre contour line leading to urban sprawl northwards and negatively impact on the Dee Valley character. The site is only partially related to the main settlement of Milltimber, and proximity to facilities is an issue. The surrounding infrastructure including education facilities are at capacity due to existing approved developments. There are safety concerns relating to the entrance of the farm and its proximity to the new primary school, on a dangerous bend in the road, and concerns regarding density.

Bid Site B0940 - Peterculter East 2

833: The site is undesirable. It is not required to meet Aberdeen City and Shire Strategic Development Plan 2020 housing allocation target and would not conform to Policy D3 density policy requirements. The area is valued Green Belt /green space. The proximity to the Aberdeen Western Peripheral Route and A93/B979 junction conflicts with Main Issues Report stipulations on development along the Aberdeen Western Peripheral Route. Development would impact negatively on residents of Camphill School during and after construction. SEPA flood maps identify a medium risk of flooding and the site is understood to have flooded during Storm Frank. There is a risk of coalescence between Milltimber and Culter. Education capacity issues are of concern.

Bid Site B0941 - Peterculter East 3

833: Undesirable for following reasons. The site is not required to meet Aberdeen City and Shire Strategic Development Plan 2020 housing allocation target and would not conform to Policy D3 density policy requirements. The area is valued Green Belt /green space. Proposal would detract from semi-rural feel of Deeside Way. The proximity to the Aberdeen Western Peripheral Route and A93/B979 junction conflicts with Main Issues Report stipulations on development along the Aberdeen Western Peripheral Route. Development would impact negatively on residents of Camphill School during and after construction. SEPA flood maps identify a medium risk of flooding and the site is understood to have flooded during Storm Frank. There is a risk of coalescence between Milltimber and Culter. Education capacity issues are of concern.

PETERCULTER

Bid Site B0928 - West of Malcolm Road

700: Remain as Green Belt / Green Space Network. Concerns regarding drainage and access.

717: The site for 10 residential units is owned by the housebuilder and can be developed in the short term. It is a logical location for development, and scored higher in the Development Options Assessment than the allocated site OP54. The site is sheltered due to surrounding properties and landform. Drainage issues can be addressed through development. The site fits well within the landscape, is immediately adjacent to existing dwellings, is within 800 metres of a bus stop, with access to facilities. School capacity will be met via the opening of Countesswells Academy. The bid assessment score of the following aspects should also be higher: Exposure, drainage, landscape fit, relationship to existing settlement, accessibility, proximity to facilities and service infrastructure capacity.

Bid Site B0929 - Guttrie Hill West

833: The site is undesirable. The site is Green Belt and Ancient Woodland. Proposal would result in housing which is remote from facilities and public transport therefore will be car dependent.

873: Support the allocation for the development of a small cluster of five self-build homes. Self-build plots align with the requirements of Scottish Planning Policy and would add to the housing mix. The site has a history of development in the form of quarrying, that tree planting is relatively recent, Should development take place there would be replacement planting, including diversification of replacement species planting and offsetting.

Bid Site B0930 - Guttie Hill East

365, 498, 508, 681, 700, 712, 946, 953, 1091, 1096: Object to the failure to identify the site in the Proposed Local Development Plan and support the proposal for a proposed alternative energy refuelling station and employment land of Class 4 / 5. Planning policy at all levels supports promotion of sustainable transport technologies to meet national zero carbon economy ambitions and local hydrogen promotion strategies. Allocation of the site would provide opportunity for Aberdeen City Council to plan for a sustainable future in accordance with Scottish Planning Policy (paragraph 275 and 289) and the Council's sustainable vision and hydrogen promotion strategy. Development will support investment and creation of jobs in the area. The benefits include the promotion of renewables and sustainable transport initiatives through hydrogen refuelling and electric vehicle charging. The site is in sole ownership, viable, on the strategic transport network with no dedicated refuelling station, located next to major Aberdeen Western Peripheral Route junction therefore access is not of concern. Allocation if the site will lead to wider economic and wider community benefits such as connectivity to core path network through the potential for pedestrian link over the Aberdeen Western Peripheral Route. There is no overriding issue to prevent allocation of site.

833: Proposal is unsuitable for inclusion in the Proposed Local Development Plan. The site is exposed. This is not a good location for the proposed use. There are better commercial prospects on A944/ Aberdeen Western Peripheral Route junction. The development would not serve the local community and would be car dependent to reach proposed employment units. There is a risk of coalescence with Culter.

Bid Site B0938 - Lovers Walk

833: The site is undesirable. Development would be adjacent to popular riverside walk. The sloping site is very visible from south. There could be a negative impact on Camphill School residents during construction.

862: Site is suitable for 12 residential units which should be included in the Proposed Local Development Plan. Development of the site would enable improved landscaping, improved open space and greater housing mix amongst other benefits. Do not agree with the Council's assessments of the Bid Site relating to Green Space Network, Green Belt, flooding and drainage. OP46 was not considered desirable by officers for allocation, the decision to allocate OP46 is illogical. This site, put forward during the Call for Cites at Pre-Main Issues Report stage and Main Issues Report stage, is more suitable and deliverable than OP46.

Bid Site B0946 - Malcolm Road

812: Object to the project. Local services and facilities are at capacity including Peterculter Medical Practice, Peterculter school, and the sewage system in the area. Development will have additional impact and upgrades will be required. There will be an increase in traffic due the site, and there are concerns regarding accessing Malcolm Road from the site.

926: Promote site for 52 detached, semi-detached and affordable homes. Site was promoted for development in the Proposed Local Development Plan 2015 (OP52). The site would be infill as it abuts or is bounded by sites OP52, OP53, OP54 and OP109. The site can be delivered immediately. There is local support, including from the Community Council. The site is well serviced and there is capacity within existing infrastructure. The proposal will contribute to the local economy and support the school role. There is good access to and from the site, for vehicles and pedestrians, and bus links. Site will link to OP53, and there are community facilities and employment opportunities available close to the site. There will be limited impact to landscape and the site has defensible boundaries. The site is not Ancient Woodland, it is undeveloped grassland with re-seeded trees from previous commercial woodland felling.

Bid Site B0902 - Malcolm Road

700: Remain as Green Belt / Green Space Network.

Bid Site B0903 - West Craigton Farm

700: Remain as Green Belt / Green Space Network. Concerns over land ownership, and topography would make drainage problematic.

Bid Site B0911 - Culter House Road

833: Object to development proposal. Site is unsuitable for development and should not be included in the Aberdeen Local Development Plan.

833, 1163, 1168: The proposal is not required to meet the Aberdeen City and Shire Strategic Development Plan 2020 housing allocation target, and there is a lack of demand for additional housing due to economic downturn. There are concerns regarding biodiversity loss, destruction of habitats and reduction in Green Space Network. The site is close to the Aberdeen Western Peripheral Route and conflicts with Main Issues Report to avoid development in these locations. There is a risk of coalescence. The site is proposal for 100% affordable housing yet far from facilities, services and public transport, and will increase car use. Development will impact on access to recreational and wellbeing opportunities. Education and healthcare capacity are an issue.

Bid Site B0922 - Land at West Craigton

700, 730: Support undesirable status. Remain as Green Belt / Green Space Network. The site is low lying and with drainage issues. It was previously subject to an unsuccessful planning application.

WESTHILL

Bid Site B0918 - Land at Mill of Brotherfield

730, 833: Support undesirable status and decision not to allocate. The site is not required to meet Aberdeen City and Shire Strategic Development Plan 2020 housing allocation target. The site is zoned as Green Belt. The site is isolated therefore it is far from facilities and would be car-dependent. It does not meet Policy H3 density requirements. Surprised that the proposal is for housing.

NEW SITES FROM PROPOSED LOCAL DEVELOPMENT PLAN STAGE

Alternative Use: OP40 – Cults Pumping Station

833: Doubtful a housing development would be practical or economical. Site should be made available as civic amenity space relating to the heritage pumping station.

New Site: The Waldorf School - including Bid Sites B0910 and B0919

871: Allocate the Waldorf School on Craigton Road and the adjoining parcels of land which were bids sites B0910 and B0919 for the Main Issues Report. The site should not be designated as Green Belt and it should be considered brownfield. The Spatial Strategy needs to be amended to include the site. The site has benefits include securing a listed building, accessibility and the use of a brownfield site.

New Site: Friarsfield Expansion Area (Part of Bid Site B0910)

895: Land at Craigbank and Corbie (B0910), now to be known as the Friarsfield Expansion Area, for approximately 180 new homes. The site to the east, referred to as Newton Farm, is subject to a separate representation. These sites should be considered as individual housing allocations, as well as being an option for allocation as one complete development as the original bid, Friarsfield North. Do not agree with Officer's assessment in support of site B0910, particularly in relation to Green Belt and landscape fit. Craigton Road would be the logical location for the Green Belt boundary in line with paragraph 51 of Scottish Planning Policy. The 90 metre contour line in an arbitrary line and each site should be considered on its own merits, there are some areas where development already breaches the 90 metre contour line. A Green Belt review is required to take place as part of this Proposed Local Development Plan review. Do not support the approach taken to rezone employment land sites, when there are residential bid opportunities located throughout the city which can be brought forward and developed. There are no impediments to the delivery of the site, and no infrastructure capacity issues to overcome. The site would be a natural extension of OP41 and would make use of the recently completed link road. This is a substantial piece of road infrastructure which would be left underutilised, contrary to the requirements of Scottish Planning Policy. The development of the site would deliver much needed market and affordable housing for Cults. The site make best use of existing resources as there is new infrastructure with capacity to support additional development; it provides a defensible Green Belt boundary as the site is not required for Green Belt purposes. The site has limited landscape impact as demonstrated through a Landscape and Visual Appraisal. The site was previously allocated in the 2004 Aberdeen Local Plan and the principle of development has therefore previously been established. The site is compliant with the Aberdeen City and Shire Strategic Development Plan 2020 as is not an extension to a strategic or masterplanned site, of which only six are identified and would meet the requirement for additional housing in the Aberdeen area, and would help to ensure that there are a range of sites across the City in various locations, which are able available to meet housing delivery in Aberdeen. It is in a sustainable location close to a neighbourhood centre and offers great connectivity for walking/cycling with the existing Core Path network.

New Site: Newton Farm (part of Bid Site B0910)

895: Land at Newton Farm (part of B0910) for approximately 100 new homes. The remaining portion of B0910, the Friarsfield Expansion Area, is subject to a separate representation. These sites should be considered as individual housing allocations, as well as being an option for allocation as one complete development as the original bid, Friarsfield North. Do not agree with Officer's response to the representation submitted in support of site B0910, particularly in relation to Green Belt and landscape fit. The mature tree belts and/or the farm access track and buildings to the north of the site would be the logical location for the Green Belt boundary in line with paragraph 51 of Scottish Planning Policy. The 90 metre contour line in an arbitrary line and each site should be considered on its own merits. There are some areas where development already breaches the 90 metre contour line. A Green Belt review is required to take place as part of this Local Development Plan review. Do not support the approach taken to rezone employment land

sites, when there are residential bid opportunities located throughout the city which can be brought forward and developed. There are no impediments to the delivery of the site, and no infrastructure capacity issues to overcome. The site would be a natural extension of OP41 and would make use of the recently completed link road. This is a substantial piece of road infrastructure which would be left underutilised, contrary to the requirements of Scottish Planning Policy. The development of the site would deliver much needed market and affordable housing for Cults. The site make best use of existing resources as there is new infrastructure with capacity to support additional development; it provides a defensible Green Belt boundary as the site is not required for Green Belt purposes. The site has limited landscape impact as demonstrated through a Landscape and Visual Appraisal. The site was previously allocated in the Aberdeen Local Plan 2004 and the principle of development has therefore previously been established. The site is compliant with the Aberdeen City and Shire Strategic Development Plan 2020 as is not an extension to a strategic or masterplanned site, of which only six are identified and would meet the requirement for additional housing in the Aberdeen area, and would help to ensure that there are a range of sites across the City in various locations, which are able available to meet housing delivery in Aberdeen. It is in a sustainable location close to a neighbourhood centre and offers great connectivity for walking/cycling with the existing core path network

New Zoning: Land Between Bielside House and the Deeside Way

1131: Requests that an area of land between Bielside House and the Deeside Way is rezoned from Residential H1 to Green Space Network. This area of land should be incorporated into the protected area of the Deeside Way including its verges and embankments.

New Site: Brookfield, Murtle Den, Milltimber

784: Promotes the identification of a new Opportunity Site on 1.82 hectares of land suitable for four houses. The site would not adversely impact on the settlement strategy. The land is non- productive grassland and can be well contained within existing and proposed woodland. The site sites adjacent to the Oldfold site, and will have a minimal impact on services.

New Site: Hill of Ardbeck 1

844: Object to the non-inclusion of the site. The site should be included in the Proposed Local Development Plan as a mixed use opportunity site, suitable for a mix of public open space, allotments and residential development of 44 units. The site has been subject to previous development bids. Reporters have noted the site has development potential for mixed use, including specialist employment. The site is neglected, overgrown and is used for informal recreation by the public. The site is mostly enclosed by existing residential development, and is well positioned for road access, community facilities, school infrastructure, active travel routes and public transport. 44 units will be developed with 36% affordable housing (28 mainstream units and 16 affordable) and a large area of public open space. Existing rolled forwards housing allocations (OP51, OP52, OP109) are constrained and new allocations (OP53, OP54) are unwelcome. The site would provide public open space, allotments and an appropriate scale of development.

New Site: Hill of Ardbeck 2

844: Object to a derelict housing site being zoned as Green Belt and Green Space Network. The house has been subject to previous development bids, as part of a larger bid. Reporters have noted the site has development potential for mixed use, including specialist employment. The site is brownfield, well connected and sustainably located. It would be inconspicuous in the wider landscape. A Green Belt review is required. The site is neglected, overgrown and is used for informal recreation by the public. The site is mostly enclosed by existing residential development and roads, and is well positioned for road access, community facilities, school infrastructure, active travel routes and public transport.

New Site: Burnside Road – comprises part of Kennerty Farm (Bid Site B0934)

954: (reference in submission of site now being referred to as Burnside Road). Original bid submission was for 25 units, this proposal seeks the addition of a smaller site consisting of approximately 15 units which incorporate live/work units. The site was assessed during the Examination of the extant Local Development Plan 2017 and the Reporters noted the site is well contained and the only issue being accessibility, with concerns raised relating to capacity of the road network and the provision of safe walking and cycling routes in to Peterculter. These concerns can be addressed. The site abuts the Deeside Way thereby providing a dedicated, safe and pleasant route. The opening of the Aberdeen Western Peripheral Route has resulted in less traffic on North Deeside Road, meaning that there is now capacity on the road network. The amended proposal (approx. 15 units) would have a negligible impact on the road network. There are four possible vehicle access routes to the site and there is sufficient number of passing places available. Lorries currently access the site for agricultural purposes. Do not agree with the Development Options Appraisal Report. Suggest rescoring the Development Option as follows: 3 for proximity of employment opportunities, 2 for Exposure/Aspect, Flood Risk, Natural Conservation, Landscape Fit, Relationship to existing settlement and proximity to facilities, Accessibility, Service infrastructure capacity, Other constraints – pipelines. Concerns also raised regarding inconsistencies of the allocation process, with reference made to the assessments undertaken for Bid reference B0916 - OP54, Craigton and Bid reference B0948 - OP53, Tillyoch. Both sites are allocated within the Proposed Local Development Plan (the former receiving a score of 48 and the latter 44). This site (B0934) is consistent with the Aberdeen City and Shire Strategic Development Plan 2020 in being small scale would contribute to ensuring that there is a mix of site sizes identified in the emerging Local Development Plan, providing opportunities for a range of house builders and housing types and tenures, including live/work units. The site response to the current economic and social climate given increased interest in more flexible working arrangements.

New sites: H2 storage site Site A – linked to Site B below

915: Site will support transition to low and zero carbon technology. The site should be allocated as it supports Aberdeen City's aspirations to be a world leader in the energy sector and the Energy Transition and Net Zero Carbon aspirations; it provide a defensible Green Belt boundary as the site is not required for Green Belt purposes. The site will

provide storage and distribution hub, and hydrogen refuelling. Hydrogen will be used for domestic and industrial heating. Proposed Local Development Plan focus is on hydrogen for transport, there needs to be a wider focus. Located adjacent to an existing industrial process in the Green Belt, therefore will be complementary to the existing use.

New Site: Residential (incorporating OP54 and Bid Sites B0903 and B0928) Site B - linked to Site A above)

915: Site will support transition to low and zero carbon technology, by demonstrating the potential of emerging hydrogen technology. The site should be allocated as it demonstrates the viability of hydrogen fuel technology utilising renewable energy for domestic use, it supports Aberdeen City's aspirations to be a world leader in the energy sector and the Energy Transition and Net Zero Carbon aspirations, it provides a defensible Green Belt boundary as the site is not required for Green Belt purposes. The proposal would support the requirement for additional housing in the Aberdeen area and is compliant with the Aberdeen City and Shire Strategic Development Plan 2020; the proposals would help to ensure that there are a range of sites available across the City in various locations, which are able to meet housing delivery in Aberdeen. This is an infill site, surrounded by residential use, with defined boundaries. The site does not meet the requirements of Green Belt, there would be no impact on landscape setting, character or identity, and no impact to open space. It will provide a new defensible edge to Peterculter via the mature woodland and farm access and buildings. The site is easily accessible, with good connectivity. Green Space Network in this location is to provide connectivity between the urban area and the Cutler Burn District Wildlife Site. This can be achieved via a smaller area zoned as Green Space Network. The impact of COVID-19 has led to a change in working patterns (working from home) and expected amenities are required to be closer to home, the site can deliver these.

Modifications sought by those submitting representations:

PITFODELS

Bid Site B0912 - Airyhall Road / Craigton Road South

859: Amend the Proposed Local Development Plan to allocate B0912 – Airyhall Road/Craigton Road South for 70 – 75 new homes. Amend proposal map.

Bid Site B0913 - Airyhall Road / Craigton Road South

859: Amend the Proposed Local Development Plan to allocate B0913 – Airyhall Road/Craigton Road South for 30 new homes. Amend proposal map.

Bid Site B0914 - Airyhall Road / Craigton Road South

859: Amend the Proposed Local Development Plan to allocate B0914 – Airyhall Road/Craigton Road South for a mix of community commercial uses. Amend proposal map

Bid Site B0917 - Land East of Inchgarth Mews

769: Include site for approximately 15 home with associated north- south green links as shown in Figure 4.

Bid Site B0944 - Inchgarth Road

833: Site should be included in Proposed Local Development Plan as Planning Permission in Principle, subject to Conditions, has been approved.

CULTS

Bid Site B0910 - Friarsfield North

895: Allocate site B0910, either wholly or partially. (further new sites discussed below)

Bid Site B0915 - Land at Sunnyside, Cults

769: Include site as a small scale extension to the OP41 site.

MILLTIMBER

Bid Site B0901 - Culter House Road

188: Allocate B0901 Culter House Road for residential development in the Proposed Local Development Plan.

Bid Site B0905 - East Lodge, Culter House Road

575: Identify site for up to 5 homes on land at East Lodge, Culter House Road and subsequential changes to Appendix 2 and Proposals Map.

Bid Site B0906 - Contlaw

744: Allocate B0906 Contlaw.

Bid Site B0909 - Pineacres

743: Remove NE2 Green Space Network from B9090

Bid Site B0929 - Peterculter East 1

862: Allocate site for 100 units.

Bid Site B0924 - Milltimber South (OP114)

132: Redevelop brownfield sites like Woolmanhill and Castlegate

745: Develop the area as a public park and recreation ground.

889: Amend the Proposed Local Development Plan for OP114 Milltimber South as an allocation for 60 houses and 1,225 square metres employment / retail use.

1162: Provide internet to all / prevent further housing estates in the area.

Bid Site B0943 - Milltimber Farm

862: Allocate site for circa 70 units.

Bid Site B0947 - Binghill House (Application Reference 200750PPP)

833: If 200750 planning application is approved site should be included in the Proposed Local Development Plan.

893: Allocate the site at Binghill House as residential, restricted to development for over-60s only.

PETERCULTER

Bid Site B0928 - West of Malcolm Road

717: Identify the bid as an opportunity site for 10 homes.

Bid Site B0929 - Guttrie Hill West

873: The proposal is for a small cluster of five houses on the southern edge of the site with associated woodland improvements and improved public access to the area including potential for additions to the core path network. It is requested that the Proposed Local Development Plan is amended and the site is identified for development in the next local development plan to allow for a residential development of five houses with associated woodland, biodiversity and access improvements.

Bid Site B0930 - Guttrie Hill East

712: Request site be included in the Proposed Local Development Plan. Appendix 2 - Opportunity Sites should be modified to include new site encompassing 2.7 hectare site at Guttrie Hill East for vehicle refuelling station, focusing on alternative sustainable fuels, associated retail and business start-up units. Amend City Wide Proposals Map to reflect addition of site with site boundaries per original Development Bid.

946, 953, 1096: Identify B0930: Guttrie Hill East as an Opportunity Site for a new refuelling station, associated retail use and business start up units.

Bid Site B0938 - Lovers Walk

862: Allocate site for 12 units.

NEW SITES

Alternative Use - OP40 Cults Pumping Station

833: Site should be made available as civic amenity space relating to the heritage pumping station.

New Site: Waldorf School (also includes Bid Sites B0910 and B0919)

871: Identify the former Waldorf School as identified on the location plan in Appendix 1 of the submission as an Opportunity Site for the redevelopment / reuse of the existing buildings at the former Waldorf School. Remove the Green Belt designation from the site to support the redevelopment / reuse of the existing buildings at the former Waldorf School. List the former Waldorf School within Appendix 2 - Opportunity Sites as an Opportunity Site with a Residential Policy. Within the other factors reference would be made to the potential to provide a long-term use for the former Convalescent Hospital building. Include allocation for development of the land surrounding Waldorf School (Main Issues Report references B0910 and B0919 within the Proposed Local Development Plan to improve the connections between Craigton Road and Craigbank Drive and improve the sustainability of this location.

New Site: Friarsfield Expansion Area (Part of Bid Site B0910)

895: Allocate site B0910, either wholly or partially. The areas shown in Figure 1 should be considered separately as each could be developed independently of the others. Friarsfield Expansion Area (14.2 hectares) should be allocated for approx. 180 houses.

New Site: Newton Farm (Part of Bid Site B0910)

895: Allocate site B0910, either wholly or partially. The areas shown in Figure 1 should be considered separately as each could be developed independently of the others. Newton (6.3 hectares) should be allocated for approx. 100 houses

New Site: Brookfield, Murtle Den, Milltimber

784: Identify a new Opportunity Site on 1.82 hectares of land suitable for 4 houses.

New Bid 1: Hill of Ardbeck (larger site)

844: Allocate Hill of Ardbeck as an opportunity site for 44 new homes, with urban green and allotments.

New Bid 2: Hill of Ardbeck (smaller site)

844: Allocate Hill of Ardbeck as an opportunity site for two new homes.

New Site Kennerty Farm (Burnside Road) (Part of Bid Site B0934)

954: Proposing part of Bid Site B0934 - Kennerty Farm site, (now referred to as Burnside Road) and as shown in the Appendices of the submission, to be allocated in the Proposed Local Development Plan for a residential development of, indicatively, 15 houses, including live/work units.

New Site: H2 storage site Site A – linked to Site B (below)

915: Allocate site. The two areas (Site A and Site B) shown in Figure 1 of the submission should be considered collectively but be allocated for different uses as follows: Site A should be allocated as an Energy Transition Zone, to support the onsite production, storage and distribution of hydrogen fuel.

New Site: Residential (incorporating OP54 / Bid Site B0903 and B0928) Site B- linked to Site A (above)

915: Allocate site. The two areas (Site A and Site B) shown in Figure 1 of the submission should be considered collectively but be allocated for different uses as follows: Site B should be allocated as an exemplar housing project that will be designed and developed to utilise the hydrogen fuel from site A to power new-build housing

Summary of responses (including reasons) by planning authority:

In preparing the Proposed Local Development Plan, a Proposed Local Development Plan Development Options Assessment Report (CDXX), Strategic Environmental Assessment (CDXX), and Main Issues Report (CDXX) were used to identify the most suitable locations to deliver the required growth. A number of greenfield Opportunity Sites (OP sites) identified in the Proposed Local Development Plan have been carried over from the Local Development Plan 2017 (CDXX) which went through a similar site assessment process at that time. Most of these sites are at an advanced stage in terms of planning consents and Masterplans as detailed in the latest version of the Delivery Programme (CDXX). The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) sets the requirements for greenfield housing and employment land allowances and these are set out in Table 3 and Table 4 of the Aberdeen City and Shire Strategic Development Plan 2020, and is reflected within the Proposed Local Development Plan Spatial Strategy. Paragraph 4.18 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states “*new allocations should consider opportunities to reuse brownfield land and attempt to utilise the current “constrained” supply in the first instance. However; it is likely that some new development will need to take place on greenfield sites in order to help deliver the Vision and future strategy for growth...Allocations should be of a scale which would not inhibit the delivery of current strategic allocations and should not be extensions to any existing, strategic, development sites that have been subject to a masterplanning exercise*”. The Strategic Development Plan also sets a requirement for at least 40% of all new housing in Aberdeen City to be on brownfield sites.

Under Issue 2: Housing Land we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 greenfield requirements have been fully met and we are confident that a continuous five year Housing Land Supply can be met throughout the lifetime of this

Proposed Local Development Plan. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Local Development Plan.

General Strategy: Cults, Bielside and Milltimber: Undesirable Sites

833: The support for the recommendations in the Development Options is noted and welcomed.

General Strategy: Milltimber

133: Support for the position of no development on the floodplain in Milltimber, south of the Old Railway Line and bounded by the Aberdeen Western Peripheral Route is noted and welcomed.

265, 299, 366, 388, 657: The housing allocations in the Milltimber area have on the whole been allocated since the Local Development Plan 2012 (CD/XX) and rolled forward into the extant Local Development Plan 2017 (CDXX). There are no further allocations proposed within the Proposed Local Development Plan. The development of the Aberdeen Western Peripheral Route was a significant infrastructure project whose planning and construction took many years. There are no further additions proposed to the Aberdeen Western Peripheral Route.

PITFODELS

Bid Site B0912 - Craigton Road South 1

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

859: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site was previously assessed in the Examination into the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside) as part of Bid Site B0939 (Bid Site B0939 extended into the fields to the west) where it was proposed for 32 houses and a care home. The Reporter's Report noted the site has a semi-rural character, is partially covered by woodlands and forms an important part of the Pitfodels Green Belt which separates Cults from the main part of the city. The site provides physical and visual separation between communities, contributes to the landscape setting of this part of the city and provides access to open space thus contributes to all the aims of the Green Belt. It also forms a valuable part of the Green Space Network.

Bid Site B0913 - Craigton Road South (2)

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

859: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site was previously assessed in the Examination into the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside) as part of Bid Site B0939 (Bid Site 0939 extended into the fields to the west) where it was proposed for 32 houses and a care home. The Reporter's Report noted the site has a semi-rural character, is partially covered by woodlands and forms an important part of the Pitfodels Green Belt which separates Cults from the main part of the city. The site provides physical and visual separation between communities, contributes to the landscape setting of this part of the city and provides access to open space thus contributes to all the aims of the Green Belt. It also forms a valuable part of the Green Space Network.

Bid Site B0914 - Craigton Road South (3)

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

859: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site was previously assessed in the Examination into the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside) as part of Bid Site B0939 (Bid Site B0939 extended into the fields to the west) where it was proposed for 32 houses and a care home. The Reporter's Report noted the site has a semi-rural character, is partially covered by woodlands and forms an important part of the Pitfodels Green Belt which separates Cults from the main part of the city. The site provides physical and visual separation between communities, contributes to the landscape setting of this part of the city and provides access to open space thus contributes to all the aims of the Green Belt. It also forms a valuable part of the Green Space Network.

Bid Site B0917 - Land East of Inchgarth Mews

769: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site is located on Green Belt and Green Space Network site and is located close to the River Dee Special Areas of Conservation and the River Dee Corridor Local Nature Conservation Site (CDXX). Development on this site would also impact on the surrounding landscape, and any development would only be partially related to the main settlement of Cults. The area helps to maintain the separate identities of Cults and Aberdeen and the overall landscape setting of the city. It therefore provides a valuable Green Belt role. There is limited connectivity to services and public transport, and school capacity is of concern. The respondent notes the site will share infrastructure with a neighbour approved development to the north – this is planning application 181224/PPP (CDXX) for a “Residential led development for the retired/elderly (including affordable housing), a 50 bedroom care home and approximately 500 square metres of ancillary retail/community use, together with public open space and associated infrastructure including a link road”. The Planning Development Management Committee on 30 April

2020 took the decision to approve this application conditionally subject to a legal agreement. The application is still pending at the time of writing.

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0944 - Inchgarth Road

160, 534, 833: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site was previously assessed in the Examination into the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside) where the loss of the physical and visual break between settlements was deemed to fundamentally alter the landscape setting and the character of the conservation area. The support for the proposal has been noted. The site has been subject to a planning application 181224/PPP (CDXX) for a "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". The Planning Development Management Committee on 30 April 2020 took the decision to approve this application conditionally subject to a legal agreement. The applicant is still pending at the time of writing. The Council took a view (Minute of Planning Development Management Committee, CDXX) which placed greater weight of development at the site and concluded the proposal would result in the provision of much needed retirement housing in the area and that there would be community benefits delivered in terms of the community facility and by the link road which would reduce traffic and result in associated improvements to road safety, congestion and amenity on adjoining residential streets. As the site is minded to receive planning permission in principle it is not deemed necessary to identify it as an Opportunity Site. The application is pending at the time of writing. The granting of planning permission in principle does not guarantee that the Matters Specified in Conditions will be met or that the development will be initiated within the time limits of the consent. The zoning remains appropriate until such time the development is completed, and the next iteration of the Local Development Plan can reflect this.

Bid Site B0923 - Hillhead of Pitfodels

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0936 - Treepark 1

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0937 - Treepark 2

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

CULTS

Bid Site B0910 - Friarsfield North

356, 600, 833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed. The comments submitted relating to rainfall events and existing surface water drainage capacity relating to Friarsfield development (OP41 within the extant Local Development Plan 2017) have been noted.

895: The site is proposed for 280 residential homes. The proposed site is categorized into three distinct parts, Craigbank and Corbie, and Newton. Newton sits to the east of the other two areas. We do not propose to allocate B0910 for development. Aberdeen City Council has reassessed this site, considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site is located in an area of Green Belt which acts as a green backdrop to the existing development at Friarsfield and to Aberdeen as a whole. It is part of an area which serves to maintain the separate identities of Cults, Countesswells and Aberdeen. Development will have significant impacts on landscape and would be highly visible from the south. The settlements along Deeside are contained within the 90 metre contour line and this development would go beyond this. The development is poorly located to public transport and community facilities, and therefore would be car dependent.

The Finalised Aberdeen Local Plan 2004 became the Local Plan 2008 where this site was identified as Green Belt and Green Space Network. This zoning has been carried through from the Local Development Plan 2012 and the extant Local Development Plan 2017. The development of Friarsfield North was discussed in the Public Inquiry into the Finalised Aberdeen Local Plan 2004 (CDXX, Issue 92: Friarsfield) which removed the land from development, zoning it as Green Belt and Green Space Network, the justification for doing so related to impact on landscape due to breaching the skyline. The site was also discussed in the Examination of the Local Development Plan 2012 (CDXX Issue 38: Allocated Site: Friarsfield OP51). The western section of B0910 (Craigbank and Corbie) were known as B0901, B0921, B0927 in the Main Issues Report 2009 (CDXX), and within that document were regarded as promising in terms of possible development land of 185 houses in Phase 2 (2017-2023). The site was not taken forward within the Proposed Local Development Plan 2010 (CDXX) or subsequently allocated in the Local Development Plan 2012 (CDXX, CDXX) due to school capacity issues (CDXX), and landscape implications. (CDXX). The impact of development on school capacity and the steep slopes of the site were discussed in terms of impact on landscape in the Examination into the Local Development Plan 2012. It was noted and the Reporter agreed the slopes of Friarsfield North provide a backdrop to Cults, and development here would have an unacceptable landscape impact (CDXX, Issue 38: Allocated Site: Friarsfield OP51:). The Bid Site can be considered an extension to an existing, strategic, development site which has been subject to a masterplanning exercise. The site boundary of OP41 Friarsfield has been reduced within the Proposed Local Development Plan to rezone the build-up area as

residential. The site would therefore not accord with paragraph 4.19 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX).

Bid Site B0915 - Land at Sunnyside, Cults

769: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). Planning Application 200171/DPP (CDXX Committee Report, CDXX decision notice) is noted in the representation as strengthening the suggestion that this small site could be a valuable extension to the OP41 Friarsfield. The boundary of site OP41 Friarsfield has been in place since the Local Plan 2008, and rolled forward within the following two Local Development Plans. The boundary of site OP41 Friarsfield has been modified in the Proposed Local Development Plan to remove areas already built out and zoned as residential. What remains of OP41 Friarsfield corresponds to the original western boundary of OP41 Friarsfield. An extension to OP41 Friarsfield is not required. The site as it is currently zoned provides setting, open space and a defensible Green Belt boundary. The Bid Site can be considered an extension to an existing, strategic, development site which has been subject to a masterplanning exercise. The site boundary of OP41 Friarsfield has been reduced within the Proposed Aberdeen Local Development Plan to rezone the build-up area as residential. The site would therefore not accord with paragraph 4.19 of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX).

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0919 - Land at Craigton Road

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0924 - Loirsbank

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0931 - Friarsfield Woodley

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0949 - Friarsfield Sunnyside

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

MILLTIMBER

Bid Site B0901 - Culter House Road

470, 833, 1163, 1168: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

188: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site is all Ancient Woodland. Although the trees have been felled this designation is still valid as it also relates to soil, and seeds that may be present within it. Development would impact on landscape features and would intrude on landscape. The Dee Valley is one of Aberdeen's distinctive and defining features, characterized by a settlement pattern of a series of historic settlements, separated by clear areas of pasture and woodland. Development on site would erode this pattern. When viewed from the Aberdeen Western Peripheral Route, on the south side of the Dee Valley, this site will intrude on the landscape. The site would be car dependent as there are no public transport options within 800 meters, nor are there Core Paths. Active travel options are limited to the existing rural road network. The site is remote from existing community facilities.

Bid Site B0905 - East Lodge, Culter House Road

575: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states that (page 10): "*Any new development adjacent to the Aberdeen Western Peripheral Route, including the Fastlink to Stonehaven, will be resisted unless it has been properly considered through the Development Plan process, and any proposals which are not identified by a Local Development Plan will generally not be supported.*" Development within this location will not accord with the Aberdeen City and Shire Strategic Development Plan. The site is designated Ancient Woodland that sits within the Green Space Network and Green Belt. The site is unrelated to existing settlement and remote from local facilities and employment opportunities. There are also capacity constraint issues at Culter Academy, although it is noted that the proposal is only for five homes. The removal of trees would be contrary to paragraph 194 of Scottish Planning Policy (CDXX) which states that the planning system should protect and enhance ancient seminatural woodland as an important and irreplaceable resource, together with other native or long-established woods, hedgerows and individual trees with high nature conservation or landscape value.

470, 833, 1163, 1168: The support for the undesirable designation is noted and welcomed.

Bid Site B0906 - Contlaw

234, 325, 470, 659, 833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

744: We do not propose to allocate this site for development. The site was considered and

rejected by Reporters following the Public Local Inquiry into the Local Plan 2008 (CDXX: Issue 83: Contlaw Road), the Examination into the Local Development Plan 2012 (CDXX: Issue 53: Alternative Sites: Cults, Bielside and Milltimber), and in the Examination into the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside). Aberdeen City Council has assessed this site, considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). It is noted that this is a large development which will over time be supported by a mix of uses, however most of the site would be a long walk from the bus route on North Deeside Road and initially residents would be heavily dependent on private cars. The development sits above the 90 metre contour line and would be visually intrusive, therefore would have significant landscape impact. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states (page 10): *"Any new development adjacent to the Aberdeen Western Peripheral Route, including the Fastlink to Stonehaven, will be resisted unless it has been properly considered through the Development Plan process, and any proposals which are not identified by a Local Development Plan will generally not be supported."* The Aberdeen Western Peripheral Route is bound by development in very few places and runs largely through a green corridor. Building up to it will change the predominantly rural character and the landscape setting that is experienced by road users. School capacity issues are of concern (CDXX). To accommodate pupils generated from the site may require substantive works to the school (e.g. extension), the school site has limited open space to accommodate such an intervention.

Bid Site B0909 - Pineacres

660, 833: The support for the undesirable designation is noted and welcomed.

743: The land zoning of this site changed from Green Belt and Green Space Network in the extant Local Development Plan 2017 to residential and Green Space Network in the Proposed Local Development Plan. The Green Belt zoning no longer met the Green Belt criteria due to the allocation of site OP112 within the Reporter's Report into the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside). The Green Belt zoning on B0909 was no longer fit for purpose as it comprised an island of Green Belt surrounded by residential zoning and OP zoning, therefore was disconnected from other areas of Green Belt and could not be considered a buffer, corridor, strip or wedge. Only the land zoning has been modified. No housing numbers have been allocation against the site. The land use zonings of residential and Green Space Network are commonplace around Aberdeen. We do not intend to remove the Green Space Network zoning. We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). A large percentage of the site is wooded, and of this 0.8 hectare is designated Ancient Woodland. Tree Preservation Order 250 covers the whole site, and priority habitat is to be found at the western portion of the site. The removal of trees would be contrary to paragraph 194 of Scottish Planning Policy (CDXX) which states that the planning system should protect and enhance ancient seminatural woodland as an important and irreplaceable resource, together with other native or long-established woods, hedgerows and individual trees with high nature conservation or landscape value. School capacity issues are of concern (CDXX), as is access to community facilities and services.

Bid Site B0927 - Contlaw Road

833: The conditional support for the site is noted. The site forms OP112 of the extant Local Development Plan 2017. The site was added by the Reporters following the Examination of the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside) as a result of reducing housing numbers from other sites in Deeside, therefore allowing scope for some small residential developments on Deeside within the catchment of Cults Academy. Taking account of the existing woodland the impact on landscape contribution and nature conservation values the Reporter noted that on balance the site could accommodate about 10 houses. The site has been subject to a planning application 190409/DDP for 30 homes and Cults, Bieldside, and Milltimber Community Council made comment on the planning application on 03 April 2019, we understand this is the letter (CDXX) referenced in the consultation into the Proposed Local Development Plan. The planning application was approved conditionally and subject to a legal agreement at Committee on 04 November 2019 (CDXX committee report, CDXX Decision Notice).

1163, 1168: The comments received relating to impact of development on biodiversity loss, destruction of habitats, reduction in Green Space Network, remoteness from services and employment opportunities, increased car use, lack of capacity at the local Academy, lack of demand for additional housing due to economic downturn and impact on access to places for walking/cycling and running are noted. The requirement for affordable housing units is governed by Proposed Policy H5.

Bid Site B0939 - Peterculter East 1

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

862: Aberdeen City Council has assessed this site, considered it undesirable, and has rejected the inclusion of the site on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states (page 10) that: *“Any new development adjacent to the Aberdeen Western Peripheral Route, including the Fastlink to Stonehaven, will be resisted unless it has been properly considered through the Development Plan process, and any proposals which are not identified by a Local Development Plan will generally not be supported.”* Development within this location would therefore not accord with the Aberdeen City and Shire Strategic Development Plan 2020. The Aberdeen Western Peripheral Route is bound by development in very few places and runs largely through a green corridor. Building up to it will change the predominantly rural character and the landscape setting that is experienced by road users. The site would be located on Green Belt and Green Space Network site and abuts the Deeside Old Railway Local Nature Conservation Site (CDXX). Development on this site would also impact on the surrounding landscape – the area contributes to the separate identities of Peterculter and Milltimber. The site currently allows wide views of the Dee Valley and will be very visible from the Aberdeen Western Peripheral Route. School capacity issues are of concern (CDXX), as is access to community facilities and services. The allocation of OP46 is discussed under Issue 13: Allocated Sites: Loirston and Cove.

Bid Site B0942 - Milltimber South and Former OP114 and Application Reference 200535/PPP

131, 132, 133, 169, 206, 226, 230, 235, 240, 243, 250, 251, 254, 260, 264, 272, 273, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 312, 313, 314, 315, 316, 317, 318, 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, 351, 354, 355, 358, 361, 363, 366, 367, 368, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 381, 382, 383, 385, 386, 387, 388, 389, 390, 391, 392, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 430, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 469, 472, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 490, 491, 492, 493, 494, 502, 503, 504, 505, 507, 510, 511, 512, 514, 515, 517, 519, 520, 521, 522, 525, 526, 527, 528, 532, 535, 549, 550, 553, 556, 557, 558, 559, 560, 561, 562, 563, 564, 566, 567, 568, 569, 573, 574, 578, 586, 587, 588, 589, 593, 594, 595, 596, 597, 598, 604, 612, 616, 638, 648, 657, 659, 680, 683, 688, 691, 701, 703, 704, 709, 715, 716, 719, 728, 732, 733, 734, 736, 738, 739, 740, 764, 765, 771, 776, 793, 813, 814, 816, 817, 830, 832, 833, 837, 840, 841, 846, 852, 857, 858, 863, 864, 866, 867, 869, 872, 874, 875, 890, 902, 903, 904, 906, 908, 909, 911, 914, 918, 920, 948, 973, 1004, 1017, 1050, 1119, 1160, 1191, 1138, 1156, 1172, 1186: The support for the Green Belt zoning is noted and welcomed.

648, 680, 1138, 1140: The Council agrees that this site should be removed as an Opportunity Site, and therefore would also agree that the current allocation should not be increased. Bid 0942 has been assessed as undesirable and is not promoted for development.

The Need for Further Housing Development

132, 206, 241, 246, 263, 289, 311, 312, 315, 351, 355, 361, 366, 514, 541, 613, 638, 659, 680, 736, 906, 973, 1172: The Council agrees that there are more appropriate sites for development than the current OP114 allocation in the extant Local Development Plan 2017. Modifications sought suggest other sites for development, Woolmanhill and Castlegate – these are OP70 and OP96 with the Proposed Local Development Plan and both have residential uses identified as part of their allocation. There is a requirement for at least 40% of all new housing in Aberdeen City to be on brownfield sites.

The Need for Non-residential Development

355, 361, 517, 613, 680, 690, 745, 833, 973: The Council agrees that there is sufficient and more community centric areas for non-residential development and Former OP114 is not necessary to achieve this. A modification sought suggesting the area could be a public park or recreation ground. The land is privately owned therefore the decision regarding proposed land uses lies with the landowner.

Health and Wellbeing and Recreation and Community Impact

132, 240, 265, 299, 346, 354, 370, 388, 399, 541, 691, 719, 734: The benefits of Former OP114 being retained as a green-space is recognised by the Council.

Retain the Green Space

133, 206, 240, 241, 243, 246, 249, 265, 283, 326, 351, 355, 361, 381, 372, 573, 613, 659, 700, 733, 833, 1162, 1172: The Council's considered opinion is that the area should be retained as Green Belt and green space.

Landscape Character and Setting and the Natural Environment

131, 132, 133, 241, 249, 263, 264, 265, 299, 308, 351, 354, 377, 399, 512, 514, 517, 522, 558, 574, 594, 657, 659, 680, 690, 691, 719, 832, 864, 690, 745, 833, 906, 973, 1162, 1182: The amenity and natural environment benefits are recognised and valued as is Landscape Character and setting. The Dee Valley is one of the identifying features of Aberdeen: the site has landscape value since it brings a wedge of countryside into the urban area and contributes a semi-rural feel to Milltimber. This is a benefit for the whole area which should be maintained.

Development in Area

265, 289, 299, 354, 355, 367, 388, 691, 1162: Comments relating to recovery of the area after the construction of the Aberdeen Western Peripheral Route, and previous development in the area are noted.

The site has not been allocated for development and has been zoned as Green Belt and Green Space Network. The modification noting internet should be provided for all existing residents is not with in the remit of the Local Development Plan.

Infrastructure and Capacity

133, 289, 311, 371, 399, 503, 514, 517, 594, 613, 680, 719, 745, 833, 906, 1162: The comment relating to impact on infrastructure and capacity are noted. The Proposed Local Development Plan zones the site as Green Belt and Green Space Network and does not allocate the site for development.

General Comments

680, 883: The comments in relation to the Development Options Assessment and clearance of land are noted.

Allocation of site in extant Local Development Plan 2017

883, 889, 973: The allocation of the site in the extant Local Development Plan 2017 was as a result of the Report of Examination (CDXX, Issue 12: Alternative Sites: Deeside). The site was subject to the usual form of consultation required by legislation when a decision is made through the Report of Examination. It is recognised by the Council that any housing

need which was otherwise filled by the Former OP114 allocation can be achieved elsewhere.

Planning Application

131, 305, 306, 470, 464, 465, 466, 638, 648, 700, 719, 833: It is the considered and settled view of the Council that the site should be Green Belt land. The Council cannot refuse to determine planning applications or redetermine applications already approved. It is acknowledged that there is strong local objection to the site known as OP114 in the extant Local Development Plan 2017 being developed and the Planning Development Management Committee refused application 200535/PPP (CDXX). Committee report, CDXX, Decision Notice) on that site which now sits with the Scottish Ministers on appeal. No further comment on that application is necessary for the purpose of the Proposed Local Development Plan Examination as they are two distinct processes.

Objection to Removal of OP114

889: As valued green space it is the considered opinion of the Council that it would be inappropriate for development and therefore has removed it for this reason. The site provides wide views across the Dee valley from the A93. The Dee Valley is one of the identifying features of Aberdeen: the site has landscape value since it brings a wedge of countryside into the urban area and contributes a semi-rural feel to Milltimber. There is no requirement to allocate the site.

Bid Site B0943 - Milltimber Farm

470, 833: The support for the undesirable designation is noted and welcomed. It is premature to consider the setting aside of land for a roundabout at the A93 / B979 / Aberdeen Western Peripheral Route junction. A detailed evidence base is required to determine if there is need for such an intervention and this would come from the ongoing monitoring of the strategic road network to identify where there are issues and appropriate interventions. (see Issue 35: Policies T1, T2 and T3: Transport and Accessibility for more information).

862: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states (page 10) that: *“Any new development adjacent to the Aberdeen Western Peripheral Route, including the Fastlink to Stonehaven, will be resisted unless it has been properly considered through the Development Plan process, and any proposals which are not identified by a Local Development Plan will generally not be supported.”* Development within this location would therefore not accord with the Aberdeen City and Shire Strategic Development Plan 2020. The Aberdeen Western Peripheral Route is bound by development in very few places and runs largely through a green corridor. Building up to it will change the predominantly rural character and the landscape setting that is experienced by road users. The site would be located on Green Belt and Green Space Network and abuts the Deeside Old Railway Local Nature Conservation Site (CDXX). Development on this site would also impact on the surrounding landscape – the area

contributes to the separate identities of Peterculter and Milltimber. The site currently allows wide views of the Dee Valley and will be very visible from the Aberdeen Western Peripheral Route. School capacity issues (CDXX) are of concern, as is access to community facilities and services.

Bid Site B0947 - Binghill House (Application Reference 200750/PPP)

131, 169, 250, 251, 265, 272, 273, 275, 276, 277, 278,279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 297, 298, 300, 301, 302, 303, 304, 305, 306, 307, 309, 310, 311, 313, 314, 315, 316, 317, 318, 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, 358, 366, 367, 368, 369, 371, 372, 373, 374, 375, 378, 379, 382, 383, 386, 388, 389, 391, 392, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423,424, 425, 426, 433, 434, 435, 436, 437, 438, 439, 440, 441, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 462, 469, 472, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 488, 490, 491, 492, 502, 503, 505, 507, 510 511, 512, 515, 517, 519, 520, 521, 522, 525, 526, 527, 528, 553, 556, 557, 559, 560, 561, 562, 563, 564, 566, 567, 568, 578, 586, 587, 588, 589, 593, 594, 595, 596, 597, 598, 604, 612, 616, 648, 657, 683, 709, 715, 716, 719, 728, 732, 733, 736, 738, 739, 740, 765, 771, 776, 793, 813, 814, 816, 817, 830, 832, 837, 840, 841, 846, 852, 857, 858, 863, 864, 866, 867, 904, 908, 911, 914, 920, 1017, 1050, 1186: the support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Planning Application (Reference 200750/PPP)

234, 305, 306, 648, 514, 700, 1050: The planning application process is a separate function of the planning system to the Development Plan. The site is not allocated as an Opportunity Site within the Proposed Local Development Plan. The planning application was received on 03 July 2020 and as it constitutes a Major development which is considered to be significantly contrary to the Vision or wider Spatial Strategy of the Development Plan a Pre-Determination Hearing was held on 15 March 2021(CDXX, Committee Report). The planning application was subsequently refused by the Council's Planning Development Management Committee on 20 May 2020 (CDXX, Committee Report, CDXX decision notice)

The Need for Further Housing and Further Development

311, 514, 613, 736, 793, 833, 841: Noting the General Strategy response above under Issue 2: Housing Land, we conclude that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) greenfield requirements have been fully met and we are confident that a continuous five year Housing Land Supply can be met throughout the lifetime of this Proposed Local Development Plan. Accordingly, we do not consider it necessary to allocate any further greenfield sites beyond those already identified in the Proposed Aberdeen Local Plan.

Green Belt and Green Space / Natural Environment, Landscape Character and Setting / Impact on Infrastructure, and Access to Services and Facilities

265, 283, 289, 299, 311, 326, 346, 372, 388, 503, 514, 522, 594, 613, 657, 700, 733, 734, 793, 841: The comment relating to Green Belt and green space, natural environment, landscape character and setting, and impact on infrastructure, and access to services and facilities are noted. The Proposed Local Development Plan retains the Green Belt and Green Space Network zoning and does not allocated the site for development.

Support

598: The Cults, Bieldside and Milltimber Community Council are a statutory consultee to the Development Plan process. We note the comment received regarding the non-representative nature of the Community Council.

833, 864, 893: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). Access to the site is a concern with public transport facilities over 1 kilometre from the site. It is noted community facilities are proposed within the Bid, it cannot be guaranteed if or when these will be developed. The site is located within the Dee Valley. Settlements within the Dee Valley are contained within the 90-95 metre contour line; breaching this will have a negative impact on the undeveloped upper slopes of the Dee Valley and its skyline. Due to existing woodlands the development would be screened to the immediate area. It is noted that the proposal is for a proposed new retirement community for persons over 60's years of age, yet it is unknown from the description of the bid if this constitutes specialist housing. Aberdeen Local Housing Strategy 2018 – 2032 (CDXX) supports independent living for as long as reasonably practicable before residential or nursing care is required in a care home setting. Supporting independent living can include ensuring the provision of suitable housing stock to meet the needs of an increasing elderly population. It is considered that the mix of house types and tenures on sites already allocated within the Deeside area, and the housing mix required from Proposed Policy H4 (see Issue 29: Policies H3 and H4: Meeting Housing and Community Needs) will assist with meeting independent living and there is no overriding need for this type of specialist housing which would override the Council's decision not to allocate this site for development. If the application is approved and planning permission in principle is granted, it is not deemed necessary to identify it as an Opportunity Site. Granting of planning permission in principle does not guarantee that the matters specified in conditions will be met or that the development will be initiated within the time limits of the consent.

Bid Site B0907 - Albyn Playing Fields

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0920 - Binghill Farm

131, 259, 260, 470, 648, 700, 719, 833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0940 - Peterculter East 2

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0941 - Peterculter East 3

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

PETERCULTER

Bid Site B0928 - West of Malcolm Road

700: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

717: The site was considered and rejected by Reporters following the Examination of the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside), and the Examination into the Local Development Plan 2012 (CDXX, Issue 52: Alternative Sites: Peterculter). Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site is not considered suitable for development due to its isolation and poor accessibility to employment opportunities, local facilities and public transport. The proposal is poorly related to the main settlement at Peterculter and is part of the countryside north of Malcolm Road which serves to maintain its setting. It is part of the green backdrop to Peterculter which contributes to protecting its landscape setting. It should therefore remain as Green Belt.

Bid Site B0929 - Guttrie Hill West

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

873: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site was previously assessed in the Examination into the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside) where it was proposed for five homes. The Reporter's Report noted the removal of woodland would not be consistent with Scottish Government policies. The proposal would create an isolated pocket of development in the Green Belt, detached from the communities of Milltimber and Peterculter and lacking sustainable transport links and concluded that the site should not be added to the plan. The site is covered in its entirety by Ancient Woodland, is designated as a Local Nature Conservation Site (CDXX) and is also a habitat for protected species. The biodiversity value of the site would be negatively impacted by development. The site is in an unsustainable location, being completely unrelated to existing settlement

at Culter and remote from local facilities and employment opportunities. There are also capacity constraint issues at Cults Academy (CDXX), although it is noted that the proposal is only for five homes. The removal of trees would be contrary to paragraph 194 of Scottish Planning Policy (CDXX) which states that the planning system should protect and enhance ancient seminatural woodland as an important and irreplaceable resource, together with other native or long-established woods, hedgerows and individual trees with high nature conservation or landscape value.

Bid Site B0930 - Guttie Hill East

365, 498, 508, 681, 700, 712, 946, 953, 1091, 1096: We do not propose to allocate this site for development. Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site was previously assessed in the Examination into the extant Local Development Plan 2017 (CDXX, Issue 12: Alternative Sites: Deeside). The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) as well as Aberdeen City's Local Transport Strategy 2016-2021 (CDXX) both advocate support for, and greater numbers of, ultra-low and low emission vehicles. Provision exists elsewhere in Aberdeen including hydrogen refuelling facilities at Cove, Kittybrewster and the former Aberdeen Exhibition and Conference Centre (AECC), and it is considered that there is a sufficient hydrogen fuel supply to meet expected demand in the short/medium term (based on current industry predictions). There is no need for an additional hydrogen refuelling station at Guttrie Hill East at this time. With regards electric vehicle charging, there are a number of sites available within Aberdeen for rapid, fast and standard recharging. Those close to the Aberdeen Western Peripheral Route include the Park and Choose sites at Kingswells and Craibstone – the charging places (www.chargingplacescotland.org) and zap map (www.zap-map.com) virtual maps identifies the locations. Filling stations supplying petrol and diesel are available near the Aberdeen Western Peripheral Route in Peterculter and to the west of Kingswells. The introduction of a refuelling station at this location does not assist such objectives as it is first and foremost a fossil fuel station with a hydrogen station and electric vehicle charging points added on. The employment units would be isolated from the existing town centre and would not accord with sequential development tests. The site is of diminished biodiversity following the felling of all trees, however it is still classed as Ancient Woodland. The site is fairly isolated, sitting on the northern outskirts of Peterculter, 900 meters from the North Deeside Road. This is part of an area which serves to separate Milltimber and Peterculter and it plays an important Green Belt function. The proposals intended to incorporate improvements to nearby Core Paths. However, access via public transport is very poor and the only feasible means of reaching the site appears to be via car through the nearby Aberdeen Western Peripheral Route junction. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states at page 10 that: "*Local Development Plans, in line with the sequential test and Town Centre First Principle, should expressly avoid any new development that would result in a negative impact on the route or any junction. Any new development adjacent to the Aberdeen Western Peripheral Route, including the Fastlink to Stonehaven, will be resisted unless it has been properly considered through the Development Plan process, and any proposals which are not identified by a Local Development Plan will generally not be supported.*" The Aberdeen Western Peripheral Route is bound by development in very few places and runs largely

through a green corridor. Building up to it will change the predominantly rural character and the landscape setting that is experienced by road users.

833: The support for the undesirable designation is noted and welcomed.

Bid Site B0938 - Lovers Walk

862: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site abuts the River Dee Special Area of Conservation. Development on this site would also impact on the surrounding River Dee valley landscape, and any development would only be partially related to the main settlement of Culter. Flooding, drainage and school capacity are all of concern (CDXX). The allocation of OP46 is discussed under Issue 13: Allocated Sites: Loirston and Cove.

833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0946 - Malcolm Road

812: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

926: The site has been discussed in two previous Local Development Plan Examinations as part of slightly larger development bid. The most southernly conner of the larger bid was discussed in the Examination into the extant Local Development Plan 2017 (CDXX, issue 11: Allocated Sites and General Area Strategy: Deeside) and allocated as OP52 for eight homes.

The site was allocated as an Opportunity Site due to an amendment at the Council meeting on 18 August 2010 and referenced OP54: Malcom Road for 71 homes within the Proposed Local Development Plan 2010 (CDXX). The site was discussed within the Examination in Public into the Local Development Plan 2012 (CDXX, Issue 45: Allocated Site: Malcolm Road OP54) and removed as an Opportunity Site as it would result in trees loss, concerns regarding poor access to public transport and facilities, the volume of heavy goods traffic on Malcolm Road, the poor standard on footway leading south, and that development would create an isolated and obstructive urban projection north into the countryside from the main built up area of Peterculter.

Within the review of the extant Local Development Plan 2017, the site was inserted as a preferred option during a Council meeting on 12 November 2013 regarding the Local Development Plan Main Issues Report. The primary reasons being that it provided further housing opportunities and would help support the local primary school. The site was noted as OP52 in the Proposed Local Development Plan 2015 for 71 homes (CDXX, written statement, CDXX , proposals map). The site was discussed in the Examination into the extant Local Development Plan 2017 (CDXX, Issue 11: Allocated Sites and General Area Strategy: Deeside). The site boundary was modified, and the housing numbers reduced to eight homes. The justification for doing so relates to the removal of Ancient Woodland of

Long Established Plantation Origin, and the reasons previously noted into the Examination into the Local Development Plan 2012 (CDXX, Issue 45: Allocated Site: Malcolm Road OP54)- the distance on foot from local facilities and bus stops, the amount of heavy goods traffic on Malcolm Road, and the poor standard of the footway leading south, and that development would result in an isolated and obtrusive urban projection north into the countryside from the main built-up area of Peterculter – although these were still relevant it was felt they would apply with less force to a small development site.

Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Proposed Local Development Plan Development Options Assessment Report (CDXX). The site is remote from local facilities and bus stops, and there is a poor standard of footway leading south. Malcolm Road is still heavily used with goods traffic. School capacity for secondary education is a concern by 2021 (CDXX). The site is subject to Tree Preservation Order 256 and is designated Ancient Woodland of Long Established Plantation Origin Tree removal has taken place on site. Although this has been cleared the designation remains valid.

Bid Site B0902 - Malcolm Road

700: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0903 - West Craigton Farm

700: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0911 - Culter House Road

833, 1163, 1168: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

Bid Site B0922 - Land at West Craigton

700, 730: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed. There is reference made to the site previously being subject to an unsuccessful planning application. We are unable to find a planning application or pre-application proposal for the site.

WESTHILL

Bid Site B0918 - Land at Mill of Brotherfield

730, 833: The support for the undesirable designation and retaining the site as Green Belt is noted and welcomed.

New Bid Sites Not Submitted Prior to Proposed Local Development Plan Stage

For all new Bid Sites that were not previously submitted prior to the Proposed Local Development Plan Stage the following statement applies. These sites were not put forward as development bids so were not considered as such at the Main Issues Report stage, nor were they subject to site assessment or public consultation. In addition, as demonstrated in Issue 1: Vision, Spatial Strategy and Land Release Policy LR1 and Issue 2: Housing Land there is an appropriate and sufficient supply of deliverable housing and employment sites within Aberdeen City. Therefore, it is the Council's view that no change is required for the new sites put forward by representees 784, 833, 844, 871, 915, 1131, 954 and 895.

Alternative Use: OP40 – Cults Pumping Station

833: We do not propose to allocate this site as civic amenity space relating to the heritage pumping station for the reasons stated above.

New Site: The Waldorf School - including Bid Sites B0910 and B0919

871: We do not propose to allocate this site for residential development for the reasons stated above. Bid Sites B0910 and B0919 are discussed above.

New Site: Friarsfield Expansion Area (Part of Bid Site B0910)

895: We do not propose to allocate this site for residential use for the reasons stated above. The assessment of the original bid assessment for the whole site (B0910) can be found with the Proposed Local Development Plan Development Options Assessment Report (CDXX), and comments relating the while site (B0910) can be found above.

New Site: Newton Farm (Part of Bid Site B0910)

895: We do not propose to allocate this site for residential use for the reasons stated above. The assessment of the original bid assessment for the whole site (B0910) can be found with the Proposed Local Development Plan Development Options Assessment Report (CDXX), and comments relating the while site (B0910) can be found above.

New Zoning: Land Between Bielside House and the Deeside Way

1131: We do not propose to allocate this site as Green Space Network for the reasons stated above.

New Site: Brookfield, Murtle Den, Milltimber

784: We do not propose to allocate this site for four houses for development for the reasons stated above.

New Site: Hill of Ardbeck 1

844: We do not propose to allocate this site mixed use opportunity site, suitable for a mix of public open space, allotments and residential development of 44 homes for the reasons stated above. The previous development bid noted in the representation relates to the

Proposed Local Development Plan 2010. The site was discussed within Issue 52 of the Reporter's Examination Report for the Local Development Plan 2012 (CDXX, Issue 52: Alternative Sites: Peterculter). It was not allocated for development.

New Site: Hill of Ardbeck 2

844: We do not propose to allocate this site as a mixed use Opportunity Site, suitable for a mix of public open space, allotments and residential development of 44 homes for the reasons stated above. The previous development bid noted in the representation relates to the Proposed Local Development Plan 2010. The site was discussed within Issue 52 of the Reporter's Examination Report for the Local Development Plan 2012 (CDXX, Issue 52: Alternative Sites: Peterculter). It was not allocated for development.

New Site: Burnside Road – comprises part of Kennerty Farm (Bid Site B0934)

954: We do not propose to allocate this site for residential use for the reasons stated above. The assessment of the original bid assessment (B0934) can be found with the Proposed Local Development Plan Development Options Assessment Report (CDXX)

New Sites: H2 storage site Site A – linked to Site B (below)

915: We do not propose to allocate this as an H2 storage site for the reasons stated above.

New Site: Residential (incorporating OP54 / Bid Sites B0903 and B0928) Site B- linked to Site A (above)

915: We do not propose to allocate this site for residential use for the reasons stated above.

Reporter's conclusions:

Reporter's recommendations:

Issue 13	ALLOCATED SITES AND GENERAL AREA STRATEGY: LOIRSTON AND COVE	
Development plan reference:	Pages 23, 34 - 35, Appendix 2, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Lorraine Garden (47) Mark Hale (60) Galina Radkova (62) Robert Kelly (73) Keith Ross (101) Anthea Robertson (112) Suzanne Kelly (150) James McKay (157) Mrs Mary Maycock (173) Lyndsay Munro (232) Donald Todd (242) Mrs Ann Beveridge (268) Donnie MacDonald (269) Dr Mairi Mclean (270) Dr Nigel Mclean (271) Celine Simpson (364) Dave Stewart (393) Mrs Leah Stewart (394) Mr Craig Stewart (395) James Noel (428) Mr Harry Noble (475) Mrs Dorothy Noble (476) Adele Bennett (498) Katie Bennett (500) Anna Bennett (501) Lesley Morrison (513) Peter Townsley (516) Professor Carole Gray (523) Gael Sangster (524) Jamie Bennett (530) Frederick Alexander Ian Parkinson (552) Leiths (Scotland) Limited (580) Paul Macari (583) Hermiston Securities Limited (591) Mairi Mclean (601) Peter Lowit (602) Andrew Waters (609) Grant Neil McKay (610) Anco Maan (618) Lorraine Maan-Beck (619) Loran Maan (620) Nicola Maan (621) Matthew Witz (622) Ivor Nicol (623)</p>		

Gemma Morrison (624)
Stuat Murray (628)
Nigel McLean (633)
Gordon Hardie (634)
Pat Hardie (635)
Chloe McLean (636)
Eleanor McLean (637)
Hazel Anderson (639)
Niall Anderson (640)
Moirra Mapley (641)
Peter JF Ramsey (642)
Julie Kennedy (644)
Iain Kennedy (645)
Ruth Gillies (646)
Pat Brodie (647)
Steven Gray (649)
Susan Moseley (651)
Helen McGregor (654)
Mark Moseley (663)
Tara Murray (666)
Christine Dunhill (668)
Brenda Dodds (669)
Alison Gallagher (670)
Brian James Stewart (675)
Christopher Hennigan (676)
Nicholas Hennigan (677)
Karen Hennigan (678)
Olivia Hennigan (679)
Ian Milne (685)
Iain Brodie (687)
Barry Jarvis (692)
Ian Smith (696)
Kristoffer Anderson (697)
Terence Jewitt (706)
Stewart Milne Homes (717)
Philip Allan (720)
Gary Emslie (721)
Denise Allan (722)
Jackie Anderson (723)
Diane Wraay (724)
Ed Clover (727)
Dr Stewart W. Watson (737)
Keith Black (747)
Stephen Coutts (748)
Margaret Russell (750)
Edmund Smith (756)
David Cross (758)
Jennifer Cross (761)
Rev Dr Duncan Heddle (775)
EIS Waste Ltd (783)
Cults, Bieldside and Milltimber Community Council (833)
Winifred M Young (834)

Cove and Altens Community Council (854)
Matthew Joseph Foster (868)
John Higgins (870)
NHS Grampian (882)
NatureScot (888)
Scottish Government (896)
A Monro and Co and Churchill Homes Ltd (907)
Colin McFadyen (924)
The Cormer Group (930)
A. MceWAN (933)
S. McEwan (934)
Hannah Nash (938)
Genevieve Martin (941)
Alexis Cairns (942)
Thomas Reeve (949)
Kathleen Louise Reeve (950)
Linda Sim (957)
Hannah Tough (963)
Arizona Brodie (966)
James Hornby (974)
Leslie Clift (982)
Marion Clift (983)
Protect Banchory Devenick (986)
Sally Nicol (987)
Joanne McCombie (988)
David Young (989)
Ian Scott (990)
Jordanna Bradley (991)
Robert Kelly (992)
Jenna Wood (993)
Alexis Morrison (994)
Raymond Morrison (995)
Damien Wood (996)
Denise Neill (997)
Jessica Neill (998)
Caitlin Neill (999)
Michael Neill (1000)
Elaine Michael (1001)
Louise Foster (1002)
Lesley McCombie (1003)
Christina MacKay (1005)
Donald Alick MacKay (1006)
Matthew Allan (1009)
Scott Lourie (1011)
Barbara Jewitt (1012)
John Ness (1013)
Ewen Rennie (1015)
Mr E J Murison (1016)
Sarah Buchanan (1021)
Lynne Huckle (1024)
Alan Haig (1025)
Heather Haig (1026)

Neil Boyd (1027)
Linda Reeve (1028)
Colin Reeve (1029)
Susan Boyd (1031)
Nadir Mahjoub (1033)
Darron Cruickshank (1035)
Murdo Nicholson (1038)
Helen Julia Maclean (1039)
Olga Ferguson (1040)
Alexis Craig (1041)
Cycling UK (1043)
Peter MacDougall (1045)
Barry Cruickshank (1046)
James McFadyen (1047)
Graham Wilson (1048)
Rhoda Cameron (1049)
Katie Cooper (1052)
Clarke Cooper (1053)
Kirsty Wilson (1054)
Derek Cruickshank (1058)
Rita Di Mascio (1060)
Mark Shields(1061)
Alexander Mackenzie (1063)
Carin Blanchet (1064)
Derek Moir (1065)
Ben Mckillop (1066)
Jenna Lyall (1067)
Audrey Anderson (1071)
Campbell Murdoch (1072)
Thomas JD Erskine (1076)
Neil Corrigan (1078)
Jenny Corrigan (1080)
Gordon John Adie (1081)
Anne M Erskine (1082)
John Baird (1084)
Judi Martin (1085)
Elizabeth Lewis (1087)
David Philp (1090)
Jean Philp (1092)
William Townsley (1093)
Euan Gillies (1097)
Ademola Isaac (1103)
Tracey Isaac (1104)
Alice Uwins (1108)
Thomas Steven Kilpatrick (1113)
Neil Palmer (1116)
Catherine Palmer (1121)
Frances O Kane (1122)
Penelope Cogle (1124)
Mr Kenneth MacAskill (1125)
Nicola Allan (1127)
Robert Stark (1129)

Mrs S Kerr (1130)
 Kathleen Milne (1134)
 Mrs Stark (1144)
 Elaine Grant (1148)
 Trevor Cogle (1151)
 North Kincardine Rural Community Council (1152)
 Nick Parker (1159)
 S Auld (1165)
 J McQueen (1167)
 Alan Thomson (1170)
 David Speers (1171)
 Michael Duguid (1173)
 Jodie Stark (1174)
 James Beveridge (1175)
 Georgia Carter (1187)
 Patrick Napier (1189)
 Ann Brown (1191)

Provision of the development plan to which the issue relates:

Opportunity Sites in Loirston and Cove

Planning authority's summary of the representation(s):

OP46: Royal Devenick Park

Concerns Regarding Green Belt

73, 1124, 173, 232, 268, 270, 271, 513, 516, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 669, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 747, 748, 750, 761, 775, 834, 868, 870, 933, 934, 938, 941, 942, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1005, 1006, 1047, 1049, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1061, 1063, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1085, 1087, 1108, 1090, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1159, 1173, 1165, 1167, 1170, 1171, 1175: Development will result in loss of Green Belt / Green Space Network / Recreation. The site is contrary to policies within the Proposed Local Development Plan; namely Green Belt, and Green Space Network. Development, will ensure coalescence.

Concerns Regarding Protected Species and Habitats

73, 1124, 173, 232, 268, 269, 270, 271, 513, 516, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 670, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 747, 748, 750, 756, 758, 775, 834, 868, 870, 942, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1021, 1009, 1011, 1012, 1013,

1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1063, 1065, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1085, 1087, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1159, 1173, 1189, 1165, 1167, 1170, 1171, 1175: Development will result in loss of habitat and negative impacts on the Den of Leggart Local Nature Conservation Site. There are designated species in the area. Development would break wildlife corridors. Loss of open space and walking opportunities are noted. Development will remove access to natural open space, replacing it with managed space.

Exclusion of Den of Leggart from Site Boundary

888, 896: Respondents recommends mitigation which goes beyond that identified in the Environmental Report for OP46 Royal Devenick Park. Respondent advises changes to the allocation boundary (or developable area), and also woodland planting to help screen the development. The woodland in OP46 forms part of the Den of Leggart Local Nature Conservation Site and is included in the Ancient Woodland Inventory (as Long Established of Plantation Origin). It is unclear why the woodland is included within OP46. The best course would be to exclude woodland by changing the Opportunity Site boundary. The triangular shaped part of the field at the west of the site which is unconnected with the rest of the development, except via woodland, should also be excluded. Even if the woodland was excluded, the respondents would still request that information is submitted to demonstrate how the Ancient Woodland interest will be protected, including from indirect impacts such as those arising from increased recreational use, dumping of garden waste or soil compaction and changes in drainage. Appropriate buffers should be maintained, for example.

Traffic, Pollution and Infrastructure

73, 1124, 112, 232, 268, 269, 270, 271, 364, 513, 516, 523, 524, 530, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 670, 685, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 747, 748, 750, 756, 758, 834, 942, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1005, 1006, 1021, 1043, 1047, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1065, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1085, 1108, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1173, 1189, 1165, 1167, 1170, 1171, 1175: Development will increase traffic and pollution. Concern over inadequate roads, infrastructure, public transport. The area will become a rat run. The existing road infrastructure is not suitable nor will be able to accommodate the increase in traffic number and types of vehicle, leading to congestion. Traffic will use any new route as a rat run thereby having a detrimental impact on Causeymouth. There will be negative impacts to the historic environment.

Concerns Regarding Process of Allocation

1124, 268, 270, 271, 428, 516, 523, 524, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 748, 750, 756, 868, 870, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983,

986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1165, 1167, 1170, 1171, 1175: Inadequate consultation on the site due to it being added to the Proposed Local Development Plan at a late stage. Allocation of site is contrary to Officers' recommendation. There is no publicly accessible information regard discussions on or the rational for the decision. The decision undermines transparency and the publics' trust.

Demand for Housing:

1124, 112, 173, 268, 269, 270, 271, 513, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 748, 750, 868, 870, 942, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1063, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1085, 1087, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1159, 1165, 1167, 1170, 1171, 1175: Downturn in the oil industry means there is a lack of demand for housing. The removal of OP46 would not impact on the housing number of Aberdeen City, as there is an oversupply of housing sites in the City, and vacant properties. Focus should be on redeveloping Brownfield Sites.

Landscape Setting

1124, 268, 269, 270, 271, 516, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 669, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 747, 748, 750, 761, 833, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1005, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1108, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1159, 1165, 1167, 1170, 1171, 1175: Development will impact negatively on Aberdeen's landscape setting - it will result in coalescence. Impact on the character of the area. There will be a negative impact on Aberdeenshire / Leggart Brae boundary.

Flooding, Drainage and Water Abstraction

1124, 268, 270, 271, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 748, 750, 756, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1165, 1167, 1170, 1171,

1175: Flooding and drainage issues – there would be a negative effect on the Burn of Leggart and River Dee. This would result in water abstraction from the River Dee. Cumulative impact on the River Dee a concern.

The Aberdeen City and Shire Strategic Development Plan

1124, 268, 270, 271, 523, 524, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 748, 750, 868, 870, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1165, 1167, 1170, 1171, 1175: The allocation is contrary to the Aberdeen City and Shire Strategic Development Plan.

Comments Relating to Proposal of Application Notice

1124, 268, 270, 271, 523, 524, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 748, 750, 868, 870, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1165, 1167, 1170, 1171, 1175: A Proposal of Application Notice has been submitted to Aberdeen City Council for the site. Part of this is located within the Aberdeenshire Council area. This will open-up opportunities for revised development in Aberdeenshire. Note that Aberdeenshire Council will request OP46 be removed from the Proposed Local Development Plan. Comments relating to the Pre Application consultation material include height of apartment buildings and impact on landscape, visual impact and setting of the city. Car parking and traffic infrastructure shown is inadequate, and to accommodate this more green space will need to be removed.

Concerns Regarding Access to the Site

1124, 268, 270, 271, 498, 500, 501, 516, 523, 524, 530, 583, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 670, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 748, 750, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1043, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1173, 1189, 1165, 1167, 1170, 1171, 1175: Access to the site will be cross boundary, from Aberdeenshire, and new road options will ruin a Designated Heritage Path (the 12th Century drover road - Causeymouth). The existing road is well used for recreation and provides wellbeing opportunities for all ages of the community. It links to further areas of recreation. The existing road is the main route to and from

Banchory Devenick Primary School. It is a designated driving school route. The road and junction will become dangerous. Further new road infrastructure will remove Green Belt land, and trees and woodland, disrupt habitats, and cut off access for recreation.

Environmental Report

1004, 1113, 1116, 1121, 1122, 1124, 1125, 1130: Note negative environmental impacts in the Environmental Report and the lack of effective mitigation measures.

Insufficient Capacity at Lochside Academy / Local Schools

1072, 1085: Concern over Insufficient capacity at Lochside Academy / local schools

Concern over the Capacity of the Medical Centre

1021: Concern over the capacity of the medical centre

Council's Climate Policy

73: The development does not accord with the Council's climate policy.

Support for OP46 - Royal Devenick Park

930: Support the inclusion of the 150 unit (circa .8.5 hectare) residential development in the Proposed Local Development Plan. Site forms a logical extension to Aberdeen. It is largely unconstrained, can be accessed by viable access arrangements, is located in a popular area and can deliver a high quality product.

Site promoted as part of a wider development of 250 units which crosses the Aberdeen City / Aberdeenshire Local Authority Boundary.

Site and larger developable area is in single ownership, is largely unconstrained and is easily accessed. Site is located within the Aberdeen Housing Market Area and complies with Aberdeen City and Aberdeenshire Strategic Development Plan 2020 in terms of new allocation criteria and Housing Land Supply targets.

Development would not undermine the Green Belt in this location. The site is within a Strategic Growth Area. There will be no impact to character, setting and identity due to landscaping. Due to topography there will be no unacceptable negative landscape impact. The Local Nature Conservation Site will be protected and enhanced due to development. Good water quality will be maintained during construction and use, to protect the River Dee Special Area of Conservation and its tributaries. Flooding is not a concern. Trees and woodlands will be protected and enhanced. Access for active travel and motorised vehicles can be achieved via a number of means. There are no overriding transport implications. There are no infrastructure or education capacity concerns.

Site will meet the Housing Land Supply targets. The housing shortfall of 1,258 unit to 2032 could be greater than this due to the reliance on brownfield allocations, and the derivability of sites in the Aberdeen City and Shire Housing Land Audit.

Development Framework for the larger developable area has been submitted as part of representation. Updated Site Assessment has also been provided.

General Comments on Development in Torry

957: Concerned length and complexity of the Proposed Local Development Plan is overwhelming for ordinary citizens to understand. Previously involved in the Aberdeen Harbour Board Nigg Harbour development as part of Torry Community Council. Several objections and concerns were raised and not taken forward. Concerned this consultation is lip service. Concerned the health priorities mentioned in paragraph 1.3.6 are not inclusive for Torry residents. Historical sewage plant issues and proposals to build the harbour, incinerator and develop an Energy Transition Zone are harmful to the health and wellbeing of Torry citizens. Questions how removal of green spaces fits into a sustainable vision and whether all Councillors have read the entire Proposed Local Development Plan.

OP103 - Former Torry Nursery School

47: Future development at OP103 will result in a loss of privacy to surrounding existing development.

242: Ensure development reinstates access via a path or access road to the back gardens for residents of the south side of Grampian Road.

882: NHS Grampian submitted a development bid for health care uses. Objection was also made at the Main Issues Report stage. NHS Grampian continue to object to the identification of this site for housing. The existing site is constrained with no room for expansion and this site or part of this site is required to secure the future of the Torry Neighbourhood Centre. This site should be identified for health care uses in the Proposed Local Development Plan.

OP105 - Kincorth Academy

60: Concerned about the scale (height and bulk) of future development. The community will lose facilities such as green space and a swimming pool.

62: Development of this site will cause high levels of noise, dust and pollution and will make residents anxious. If development of this site has to happen there should be proper noise reduction measures in place such as high wooden barriers or tall evergreen shrubs.

1084: No objection to housing. Comments submitted relating to detail: The existing vegetation between the site and Cairnvale Terrace should be retained, as this will afford privacy for residents. The privacy of upper floor flats should be considered. There should be sufficient space between the proposed development and existing dwellings to avoid over shadowing and loss of privacy. The new development should be architecturally attractive and reflect the 1950's buildings nearby. The development should be in keeping with a garden estate with plenty of green space.

OP58 Stationfields

101, 1144 1148: Increased traffic, pressure on the road network, traffic safety concerns, will cause congestion and peak time traffic. The Coast Road unsuitable for more traffic.

101, 854, 1129, 1144, 1148, 1174, 1187: Concern over loss of green space, wildlife, countryside, recreation land and impact on health, quality of life and wellbeing. Concern over loss of village character, and consider it will be over development. Construction noise a concern.

1129: The land should be reserved for a railway station.

1129: There needs to be a balanced mix of housing on site.

1144, 1148, 1174: Concern over impacts on existing infrastructure and facilities such as schools and the medical centre. New facilities should be provided prior to development.

1144: There is insufficient demand for housing

1144: Site bounds a Conservation Area and Site of Special Scientific Interest.

1187: The site is dangerous due to the proximity of the railway line and sea cliffs.

OP60 Charlestown

1191: Request further detail on the proposals. There is sufficient land allocation in the area.

Masterplan for Cove

854: The respondent considers it vital that a masterplan is produced for Cove and Altens to offer structure to future development. The respondent supports this request through analysis of bid sites within the Community Council area.

OP107 East Tullos Gas Holder

150: Concerns over air quality and proximity to the school. Detrimental impacts of the project need to be understood

157: Concerns over air quality and building on the Green Belt. This would not have been proposed in other parts of the City. Residents of Torry are treated like second class citizens.

OP59 Loirston

Objections to the Site

393, 394, 395, 475, 476: Object to OP59 for environmental reasons, and to reduce effects of global warming, we should be reducing urban spread/development, redeveloping existing brownfield instead of creating new population growth centres, promoting strategic green spaces, maintaining wild habitats. For economic reasons, and in light of downturn of oil industry, excess office spaces should be looked at for brownfield redevelopment over new build. Queries the need for new housing in current economic climate. Development will lead to loss of green space and recreation opportunities. Concern raised about pollution levels in the vicinity of the Loch and impact on animal/bird species. Concern raised about creation of traveller site and negative effect on security of the area.

924: Neighbour notification from the Proposed Local Development Plan does not correlate to the pre-existing planning permission. Schedule 1 species are on site. Wildlife hunt in the loch. Further consultation required on the site. Site is used for recreation. Site has poor drainage. Development is contrary to Trees and Woodlands policy.

1174: Little consideration of Loirston Loch development on local facilities including healthcare providers.

Support and Amendments to the Site

591: The Proposed Local Development Plan should be amended with regard to the removal of reference to 11 hectares of employment land at OP59 Loirston and amended to mixed use instead. The respondent supports the removal of the community stadium from the allocation and the Loirston Development Framework. The respondent sets out in their submission in further detail why they consider an amendment from employment land to mixed use is acceptable.

907: Support continued allocation of site within the Proposed Local Development Plan. The Proposed Local Development Plan should reflect the changes in the soon to be updated Loirston Development Framework.

The Proposed Local Development Plan sets out that phasing should be in accordance with the Development Framework, however the Development Framework phasing strategy is indicative only and a flexible guide. It is difficult to be in accordance with a flexible guide, and consider it does not reflect the indicative nature of the phasing strategy contained in the framework.

The location of the primary school is proposed to be changed in the Development Framework and the diagram in the final Local Development Plan should reflect this. The 2019/2020 Development Framework proposes for the school to be on development block E9 not C2 as presently shown.

Condition 34 of the Planning Permission in Principle (APP/130892) requires a road network between the site and the southern section of Redmoss Road. At present this is not identified on the indicative diagram in the Proposed Local Development Plan.

Paragraph 9.3 of the Proposed Local Development Plan confirms that the Aberdeen City and Shire Strategic Development Plan 2020 looks for a density of 50 dwellings per hectare and the actual planning density of site OP59 will be determined through a detailed Masterplan or planning application, therefore 1500 units should be regarded as indicative and not prescriptive.

Amend text in Appendix 2 for OP59 to acknowledge that Flood Risk Assessment, Habitats Regulations Appraisal and Construction Environmental Management Plan have been addressed through the planning permission in principle applications and subsequent applications for matters specific in conditions.

OP55 Blackhills Quarry (Support Only)

580: Support the inclusion of the site. Zoning will safeguard the site for mineral extraction in line with approved planning permission 130490/DPP. Zoning is compliant with paragraph 238 of Scottish Planning Policy on ensuring at least 10 year permitted reserve.

The granted planning permission allows extraction and processing on site for a period of 37 years. A local quarry will support short transport distances of material to site, and support the economy. Site is cross boundary – Aberdeenshire Council granting planning consent for an extension of the quarry.

Modifications sought by those submitting representations:

OP46 – Royal Devenick Park

Remove OP46 / Return to Green Belt / Allocation Should be on a Brownfield Site

112, 232, 268, 364, 428, 523, 524, 552, 583, 601, 602, 609, 610, 622, 623, 624, 628, 633, 634, 635, 637, 639, 640, 641, 642, 644, 645, 646, 649, 651, 654, 663, 668, 669, 670, 675, 676, 677, 678, 679, 692, 697, 706, 720, 721, 722, 723, 724, 747, 748, 750, 758, 833, 868, 870, 933, 934, 938, 941, 942, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1005, 1006, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1043, 1045, 1047, 1048, 1049, 1052, 1053, 1054, 1058, 1060, 1063, 1065, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1085, 1087, 1090, 1092, 1093, 1097, 1103, 1104, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1129, 1130, 1151, 1152, 1159, 1165, 1167, 1170, 1171, 1173, 1175: Remove OP46 / Return to Green Belt / Allocation should be on a brownfield site

Alternative Location for OP46 could be Grandhome or Countesswells

513: If OP46 goes ahead access must be from the A92. Improve mix of housing. Ensure developer supports Net Zero and improve transport links to the city and adjoining developments.

Reject Proposed Development of OP46

1047: If approved - Stipulate that the only access to the development is from the A92 with no access from the Causewaymouth Road. Improve mix of housing ie bungalows, some percentage of social housing. Support Net Zero by requirement to install renewable energy heating and electric vehicle charge points. Improve transport links to the city to the development and adjoining developments.

OP103 - Former Torry Nursery School

47: Any future residential development not to be more than 2 storeys to prevent loss of privacy. Rear access to respondent's property to be maintained.

882: Amend OP103 from a housing allocation to an allocation for health care use.

OP105 Kincorth Academy

60: The Proposed Local Development Plan should include additional facilities to compensate for those lost through the redevelopment of OP105

62: Noise reduction measures.

OP58 Stationfields

101: That OP58 be rejected from the Proposed Local Development Plan and, if the site is to be developed, it should be a train station.

1129: Allocation of the site for a potential railway station after NESTRANS review. Allocation of greenfield space in the site. Housing to be allocated after railway station completed and to be mixed types as per Aberdeen City Council policy. A Masterplan should be created for this site as a priority.

1144: Reduce number of future developments in Cove. The area is over developed and unable to cope. Focus should be on enhancing and supporting existing facilities, creation of a village centre, a community, improving infrastructure by providing a railway station. Developers should consider the character of the area, heritage and requirements of the area.

1148: Site should be left as a green space, which can continue to be used by the community for recreational purposes. Limited areas of open space in the wider area and the loss of this site would be detrimental.

1174: Provide resources to existing communities prior to starting developments otherwise they can fall at the wayside i.e train station at Stationfields. Consider the prior use of the area i.e. popular recreational space in an area where green space is becoming rare. Reconsider opening this area to developers. Do not develop an area too quickly - allow service to adjust. Cove has seen exponential growth in homes and population with no adjustments to facilities or services and resulted in a loss of character. Small communities take time to develop. Consider impact on the environment and increase use of wildlife corridors. Increase brownfield use and decrease greenfield sites. Keep the heritage of communities – consider development style. Mix of affordable and luxury houses across Aberdeen and not large affordable sites.

OP59 Loirston

591: Amend the allocation of OP59 to make reference to 11 hectares of mixed use land rather than employment land.

907: Remove 'in accordance' from the wording regarding phasing on page 34 of the Proposed Local Development Plan.

The Loirston Diagram Plan (page 35) in the adopted Local Development Plan should be amended to include the agreed location of the Primary School as per the Development Framework. It should also be amended to show the option of access from Redmoss Road.

Amend text in Appendix 2 for OP59 to indicate that the number of units is indicative

924: Alter Plan if the presence of Schedule 1 fauna is identified.

1174: Increase consideration of the impacts of Loirston Loch development on the Cove facilities.

Masterplan for Cove

854: Develop a Masterplan for Cove and Altens.

Summary of responses (including reasons) by planning authority:

OP46 Royal Devenick Park

Running parallel to the production of the Proposed Local Development Plan was the Examination into the Proposed Aberdeen City and Shire Strategic Development Plan 2018. The Proposed Strategic Development Plan was submitted to the Planning and Environmental Appeals Division (DPEA) of the Scottish Government in April 2019. The Report of Examination (CD XX) was not received by the Aberdeen City and Shire Strategic Development Planning Authority until January 2020. The Report of Examination included suggested Modifications to Table 3 of the Proposed Strategic Development Plan 2018 (CD XX) which increased the Housing Allowances of any subsequent Aberdeen and Aberdeenshire Local Development Plans by an additional 939 new homes for the period 2020-2032. The approval of a Strategic Development Plan is the responsibility of the Scottish Government and there is not statutory period of time set in which it must be approved. There is, however, a statutory period of review for a Local Development Plan and consequences for local authorities should this not be met. Paragraph 24 of Circular 6/2013 - Development Planning (CDXX) states that: "*planning authorities are expected to move quickly from the MIR through to the Proposed Plan and towards submission to Scottish Ministers and adoption*". Having completed the Main Issues Report consultation, being mindful of the Circular and the statutory review period for additional sites which had come through the Call For Sites and Main Issues Report consultation processes, additional sites were selected for inclusion in the Proposed Local Development Plan. This ensured that the Housing Allowances as set in the Strategic Development Plan, which is a statutory document that the Local Development Plan must align with, are met. The sites put forward to meet the addition 939 homes requirement have been spread across the City, thus providing a range of sites of varying size and complying with paragraph 119 of Scottish Planning Policy (CDXX)

Concerns Regarding Green Belt

73, 1124, 173, 232, 268, 270, 271, 513, 516, 523, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 669, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 747, 748, 750, 761, 775, 834, 868, 870, 942, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1005, 1006, 1047, 1049, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1061, 1063, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1085, 1087, 1108, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1159, 1173, 1165, 1167, 1170, 1171, 1175: Scottish Planning Policy (CD__) paragraph 49 states that Green Belts have 3 main functions:

- directing development to the most appropriate locations and supporting regeneration;
- protecting and enhancing the character, landscape setting and identity of the settlement; and

- protecting and providing access to open space

It is considered that the site is an appropriate location for development and the reasons behind this are explained in the discussions below. Whilst the site is visible from the A90 trunk road it should be possible to reduce visual impacts through boundary and landscape mitigation. There are no coalescence issues and the site is a natural extension to the existing development at Leggart Brae. Access to open spaces such as the Den of Leggart can be protected and enhanced. These issues can be dealt with in a Masterplan which will need to be prepared for the site.

Whilst Green Belts tend to be permanent, their detailed boundaries can change in order to accommodate the development requirements of an area. Both the Aberdeen City and Shire Strategic Development Plan 2020 and Issue 2 - Housing Land acknowledge that brownfield sites cannot meet the Strategic Development Plan's housing allowances on their own. Greenfield sites are also required to ensure a continuing five year effective Housing Land Supply throughout the lifetime of the Local Development Plan. The Green Belt boundary at Royal Devenick Park has therefore been adjusted in order to accommodate the opportunity site OP46.

Concerns Regarding Protected Species and Habitats:

73, 1124, 173, 232, 268, 269, 270, 271, 513, 516, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 670, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 747, 748, 750, 756, 758, 775, 834, 868, 870, 942, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1021, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1063, 1065, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1085, 1087, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1159, 1173, 1189, 1165, 1167, 1170, 1171, 1175: Loss of habitat is likely to be limited – most of the site is open agricultural land with limited biodiversity value. However, it is acknowledged that the Den of Leggart Local Nature Conservation Site (CDXX) runs through the site. The site will require a Masterplan which can take account of the Den of Leggart Local Nature Conservation Site, wildlife links and corridors. This could enable doorstep opportunities for outdoor recreational access to natural open space in a managed way. In this way, well designed development could enhance biodiversity in line with Proposed Policy 3 Our Natural Heritage, increase access to natural open space and open up walking and recreation opportunities.

Exclusion of Den of Leggart from Site Boundary

888, 896: As mentioned above, inclusion of the Den of Leggart within the site boundary can allow it to be managed to provide doorstep access opportunities for local residents. There are other allocated sites within the Proposed Local Development Plan with similar arrangements, including OP9 - Grandhome, OP20 - Craibstone South and OP59 - Loirston.

Traffic, Pollution and Infrastructure

73, 1124, 112, 232, 268, 269, 270, 271, 364, 513, 516, 523, 524, 530, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 670, 685, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 747, 748, 750, 756, 758, 834, 942, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1005, 1006, 1021, 1043, 1047, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1065, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1085, 1108, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1173, 1189, 1165, 1167, 1170, 1171, 1175: Not all development would create an unsustainable level of traffic and this can be managed in the application process. Although more traffic can create pollution, and that is a material consideration, it is one that has little weight because it can be mitigated for in the application process and is mostly dealt with by other legislation.

Residential development at will be required to carry out a Transport Assessment according to Proposed Policy T2 - Sustainable Transport. They would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic and its impacts. Traffic calming and other management methods can be used to reduce or even prevent rat running.

Concerns Regarding Process of Allocation

1124, 268, 270, 271, 428, 516, 523, 524, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 748, 750, 756, 868, 870, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1165, 1167, 1170, 1171, 1175: This stage allows for such consultation. Being against Officers' recommendations is not a material consideration except to the extent that recommendation contains material considerations which can be weighed against others. Planning judgement can be exercised differently to the Planning Officers' planning judgement.

The rationale for the decision was elucidated in public at the meeting of the Council on 2 March 2020. That rationale being: OP46 Royal Devenick Park as opportunity site for the provision of 150 houses. This allocation is part of a much larger aspirational site which is mainly sited in the neighbouring authority of Aberdeenshire, but this allocation is not dependent on that site being brought forward by Aberdeenshire Council. The site abuts the Deeside Braes housing development on Leggart Terrace. The Development Framework which was submitted in support of this site shows the vehicular and alternative modes access being taken from the A92. Currently there is capacity at the primary and secondary schools (CDXX). There are shopping, leisure and further education facilities close by at the Bridge of Dee. The rezoning from Green Belt and Green Space Network to Residential will need to be addressed with special consideration given to the landscape

and the nearby Leggart burn. The Council believe that, with the right interventions in the site, better access and enjoyment by the wider community can be created.

Aberdeenshire Council may or may not allow development in their local authority area but this allocation within Aberdeen City Council's local authority area is independent of that.

Demand for Housing

1124, 112, 173, 268, 269, 270, 271, 513, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 748, 750, 868, 870, 942, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1063, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1085, 1087, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1159, 1165, 1167, 1170, 1171, 1175: Although demand and the availability to develop other site is a material consideration this can be balanced with producing housing in areas which the Planning Authority consider more desirable.

Scottish Planning Policy paragraph 110 (CD xx) identifies the requirement to ensure there is a 'generous' supply of appropriate and effective land for the provision of a range of housing. In addition, Local Development Plans are required to allocate land for housing on a range of sites that are effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted date of adoption ensuring a minimum five-year supply of effective housing land at all times.

Table 3 on page 30 of the Aberdeen City and Shire Strategic Development Plan 2020 (CD xx), sets out the proposed housing allowances for Aberdeen City for the period of the Proposed Local Development Plan, ensuring that a generous supply of land for housing is provided which will allow further choice and flexibility in the housing market. The Housing Allowances in the Proposed Local Development plan have been informed by the Aberdeen City and Shire Housing Land Audit 2019 (CDXX) which measures Housing Land Supply.

The Proposed Local Development Plan needs to show how the Council will meet the 5,107-housing allowance which the Aberdeen City and Shire Strategic Development Plan 2020 sets for Aberdeen for the period to 2032. Details of this are provided in Section 3 of the Proposed Local Development Plan and under Issue 2 - Housing Land. OP46 is one of the sites identified in the Proposed Local Development Plan to meet the Strategic Development Plan allowance.

The Proposed Local Development Plan at paragraph 3.6, page 22 (CD xx) acknowledges the importance of Brownfield sites and considering them for development first. The Aberdeen City and Shire Strategic Development Plan 2020 states that new housing allocations should reuse brownfield land and attempt to utilise the current constrained supply in the first instance. The Proposed Local Development Plan endorses that approach and looks to ensure that at least 40% of all new homes in Aberdeen is built on brownfield sites in line with the Strategic Development Plan targets. However, both the Strategic Development Plan and the Schedule 4 on Housing Land (Issue 2) acknowledge that brownfield sites cannot meet this allowance on their own. Greenfield sites are also

required to ensure a continuing five year Housing Land Supply throughout the lifetime of the Proposed Local Development Plan.

Landscape Setting

1124, 268, 269, 270, 271, 516, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 669, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 747, 748, 750, 761, 833, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1005, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1108, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1159, 1165, 1167, 1170, 1171, 1175: Development will not cause coalescence. Other than a group of buildings at Drumforskie and a house at South Damheads, there is no other development to the west of the A90 between the site and the Aberdeen Western Peripheral Route, some 2 kilometres to the south. The next significant development encountered is Hillside Portlethen, some 1.7 kilometres to the south of the Aberdeen Western Peripheral Route.

The character of the area is of open farmland on the site itself with suburban housing directly to the north of the site.

The boundary of the site follows the Aberdeen City/Aberdeenshire boundary to the west before cutting eastwards to the A90 following a field boundary north of the dwelling at South Damhead.

Flooding, Drainage and Water Abstraction

1124, 268, 270, 271, 523, 524, 583, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 748, 750, 756, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1165, 1167, 1170, 1171, 1175: Flooding is generally restricted to the burn running through the site and we would expect development not to encroach onto this area for flooding, biodiversity and recreation reasons. Any proposals for the site are likely to be subject to a Flood Risk Assessment and Drainage Impact Assessment.

Any development in the River Dee catchment will increase abstraction. This can be mitigated through water saving technologies as required by Proposed Local Development Plan Policy R6 Low and Zero Carbon Buildings and Water Efficiency

Water abstraction has been considered as part of the Habitats Regulations Assessment which supports the Proposed Local Development Plan. The proposed levels of allocations

in the Plan and their water requirements are within the licence agreement for Scottish Water to abstract from the River Dee.

Aberdeen City and Shire Strategic Development Plan

1124, 268, 270, 271, 523, 524, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 748, 750, 868, 870, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1060, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1165, 1167, 1170, 1171, 1175: The development has been identified to meet the requirements of the Aberdeen City and Shire Strategic Development Plan 2020 housing allocations and to contribute to the maintenance of an effective five year housing supply which is discussed in the Demand for Housing paragraph above.

Comments relating to Proposal of Application Notice

1124, 268, 270, 271, 523, 524, 602, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 720, 721, 722, 723, 724, 727, 737, 748, 750, 868, 870, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1009, 1011, 1012, 1013, 1015, 1016, 1024, 1025, 1026, 1027, 1028, 1029, 1031, 1033, 1035, 1038, 1039, 1040, 1041, 1045, 1048, 1052, 1053, 1054, 1058, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1165, 1167, 1170, 1171, 1175: The Proposal of Application Notice is a separate process from the Examination. Pre-application is not a point at which the Planning Authority can make a decision on an application that has yet to be submitted.

Concerns Regarding Access to the Site

1124, 268, 270, 271, 498, 500, 501, 516, 523, 524, 530, 583, 609, 610, 618, 619, 620, 621, 622, 623, 624, 628, 633, 634, 635, 636, 637, 639, 640, 641, 642, 644, 645, 646, 647, 649, 651, 654, 663, 666, 668, 670, 675, 676, 677, 678, 679, 687, 692, 696, 697, 706, 717, 720, 721, 722, 723, 724, 727, 737, 748, 750, 933, 934, 938, 941, 949, 950, 963, 966, 974, 982, 983, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1043, 1064, 1066, 1067, 1071, 1072, 1076, 1078, 1080, 1081, 1082, 1090, 1092, 1092, 1097, 1103, 1104, 1108, 1113, 1116, 1121, 1122, 1124, 1125, 1127, 1130, 1134, 1151, 1152, 1173, 1189, 1165, 1167, 1170, 1171, 1175: Access would be a matter for a planning application for the site to address, including any loss of desirable Green Belt land and a number of possible options may be available. Proposed Policy NE1 allows for infrastructure serving masterplanned sites to be developed in Green Belt under this clause "e) *is directly associated with essential infrastructure such as telecommunications, electricity grid connections, transport proposals identified in the Plan or roads planned through masterplanning of sites, if they cannot be accommodated*

anywhere other than the Green Belt;” Therefore Green Belt policy should not preclude development on the site.

Environmental Report

1004, 1113, 1116, 1121, 1122, 1124, 1125, 1130: All residential development will have negative environmental effects. The Environmental Report (CDXX) identifies these (as it does with all sites) and suggests mitigation measures to reduce these impacts.

Insufficient Capacity at Lochside Academy / Local Schools

1072, 1085: The School Roll Forecasts (CD__) show that Lochside Academy will be at 83% capacity in 2026 with space for a further 229 pupils. The site is also zoned to Abbotswell Primary School which will be at 68% capacity in 2026 with space for a further 95 pupils. Therefore both schools have ample capacity to accommodate pupils arising from this proposal.

Concern over the Capacity of the Medical Centre

1021: This issue has not been raised by NHS Grampian in their submission to the Proposed Local Development Plan. Nevertheless, any impacts may be mitigated the planning application stage through Proposed Policy I1 Infrastructure Delivery and Planning Obligations.

Council's Climate Policy

73: Climate change impacts and mitigation are considered in the Strategic Environmental Assessment (CD__).

Alternative Location for OP46 could be Grandhome or Countesswells

513: As noted, this site is determined as being desirable for development by the Council. Grandhome and Countesswells are already identified to accommodate significant development, and adding further housing to these areas will not increase the range and choice of housing around the City.

Support for OP46 Royal Devenick Park

930: Support for the site is welcomed

General Comments on Development in Torry

957: It is acknowledged that the Proposed Local Development Plan is a complex document. Consultation on it was not made any easier by the Covid pandemic. However, a number of measures were undertaken to try and make responding to the Plan easier, and these are outlined in the Participation Statement (CDXX) which is submitted to the Examination. The current proposals for the Harbour and Energy Transition Zone are part of this Examination and are looked at in detail in Issue 17 - Allocated sites OP56 and OP61: Energy Transition Zone, and other Allocated Sites: Torry. The purpose of the Examination is to allow independent scrutiny of the issues raised and to help ensure that any decisions taken are fair and well-considered.

OP103 - Former Torry Nursery School

The site at OP103 is a cleared brownfield site which was once a nursery school. It is located in a well established residential area in Torry and is identified as an Opportunity Site (OP103) in the extant Local Development Plan 2017. The principle of development on the site is therefore well established.

47, 242: Issues have been raised about loss of privacy and access issues which might arise as a result of development. These are matters which can be dealt with at planning application stage and people will have the opportunity to comment on detailed matters at that stage.

882: The Opportunity Site reference in Appendix 2 of the Proposed Local Development Plan is non-specific in terms of the type of development earmarked for the site. This is in recognition of the fact that a range of uses may be appropriate. The site lies in a residential area and is zoned H1 Residential in the Proposed Local Development Plan. Appropriate uses could include a health centre as requested by respondent 882, but may also include housing, community facilities or other uses appropriate to a residential area. There is nothing preventing it's development for a health centre in principle in the Proposed Local Development Plan. It is therefore appropriate to leave the Opportunity Site reference as it is to allow for a range of possible uses.

OP105 Kincorth Academy

Kincorth Academy was closed in 2018 along with Torry Academy with both schools being replaced by the new Lochside Academy beside OP59 Loirston. It was demolished in 2019. OP105 is a brownfield site identified in the Aberdeen Local Development Plan 2017 where it is identified as an affordable housing site. The principle of development on this site is therefore well established.

60: It is accepted that the closure of Kincorth Academy led to the loss of some facilities. However, it has been replaced by Lochside Academy which includes a new swimming pool and gym. Any new development on OP105 will need to incorporate open space in line with Proposed Local Development Plan Policy NE2 - Green and Blue Infrastructure.

62: It is acknowledged that construction noise is inevitable when development is being built. However, planning conditions can restrict construction to reasonable days and hours in order to protect residential amenity.

1084: Matters such as privacy and design will be dealt with during the planning application stage. Indeed, the site is now subject to planning application 210185/DPP for residential development for 213 social rented accommodation comprising a mix of unit types. The application will need to take account of new and emerging Local Development Plan policies on design, green space and residential amenity.

OP58 - Stationfields

This site was first identified in the Aberdeen Local Plan 2008 (CD XX) and has been carried through the Local Development Plan 2012 (CD XX) and again through the extant Local Development Plan 2017 following favourable consideration at the last Examination under Issue 13 (CD XX). The principle of housing on the site is therefore long established.

It is well located to benefit from, and support local services such as primary schools, shops and community facilities which are within walking distance.

Transport Issues

101, 1144, 1148: Residential development at OP58 Stationfields will be required to carry out a Transport Assessment according to Proposed Policy T2 Sustainable Transport. The developer would be required to demonstrate that sufficient measures have been taken to minimise any generated traffic, this would include any impacts on Coast Road. In addition to this, all residential proposals on this site will have to meet the standard parking requirements found in the current Supplementary Guidance Transport and Accessibility (CD XX). This will be replaced by Aberdeen Planning Guidance in due course.

Environment / Wildlife

101, 854, 1129, 1144, 1148, 1174, 1187: Where it is suspected that a Protected Species is present on this particular site, a survey will be recommended as part of any development proposal that is brought forward and it would have to comply with Proposed Local Development Plan Policy NE3 – Our Natural Heritage. In addition to this, all residential development proposals will have to comply with all relevant policies regarding protecting and enhancing the natural environment and character of the area.

A proposal for 150 homes on a 9.8 hectare site cannot be considered overdevelopment. It is acknowledged that construction noise is inevitable when development is being built. However, planning Conditions can restrict construction to reasonable days and hours in order to protect residential amenity.

Railway Station

1129: The suggestion that a railway station should be reserved on site has been noted. Aberdeen City Council recognises that a train station in Cove would help to alleviate traffic congestion. At present however, there are no firm proposals for a train station at Cove and none have emerged since the idea was first postulated in 2008, when Stationfields was first identified in a Local Plan.

Mix of Development

1129: We agree that any development that comes forward on this site would be required to deliver some affordable housing units which would help to build an overall sustainable mixed community. Development in OP58 would be required to comply with Proposed Local Development Plan Policy D1 Quality Placemaking. Proposals would be considered against these six essential qualities: distinctive, welcoming, safe and pleasant, easy to move around, adaptable and resource efficient, in order to create sustainable development that enhances the social, economic, environmental and cultural attractiveness of Cove.

Infrastructure

1144, 1148, 1174: Proposed Local Development Plan Policy I1 Infrastructure and Planning Obligations indicates that development must be accompanied by the infrastructure, services and facilities required to support new or expanded communities and the scale and type of developments proposed. Where development either individually

or cumulatively will place additional demands on community facilities or infrastructure that would necessitate new facilities or exacerbate deficiencies in existing provision, the Council will require the developer to meet or contribute to the cost of providing or improving such infrastructure or facilities.

In terms of education, Aberdeen City Council's School Roll Forecast (April 2020) (CD) indicates that Loirston Primary School is within capacity and is able to accommodate residential development that will come forward for this site. The School Roll Forecast also indicates that Lochside Academy will also be able to accommodate any residential development that comes forward.

Demand for Housing

1144: The overall need and demand for housing is discussed in detail in Issue 2: Housing Land Supply. Whilst the site does not count towards the Aberdeen City and Shire Strategic Development Plan 2020 (CD) housing allowances, it will nevertheless contribute towards maintaining a healthy five year Housing Land Supply. The Aberdeen City and Shire Housing Land Audit 2019 shows completions on site from 2021 onwards (page 56, CDXX).

1144, 1187: These representations point out the proximity of a Site of Special Scientific Interest, Conservation Area, sea cliffs and the railway line. None of these issues preclude development but they would certainly need to be taken into consideration in the development of any Masterplan for the site or the determination of a planning application. Any planning application that comes forward for OP58 Stationfields will be subject to standard consultation procedures, which would include the likes of Network Rail or NatureScot where necessary.

OP60 Charlestown

1191: OP60 Charlestown was first identified in the Local Development Plan 2012 and again in the extant Local Development Plan 2017 prior to being carried forward into the Proposed Local Development Plan. In all cases it is identified as Strategic Reserve Employment Land – which in the case of the Proposed Local Development Plan is earmarked for development in the period 2033-40. The principle of reserving land for future employment use on OP60 is therefore well established.

The Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) requires the identification of 70 hectares of Strategic Reserve Employment Land in Table 4 on page 37. The Proposed Local Development Plan identified 3 sites to meet this requirement in Table 4 on page 25, with OP1 and OP18 being the other two sites. OP60 should not be developed during the lifetime of the emerging Local Development Plan. It would only be brought forward in future Local Development Plans if needed at the time.

Masterplan for Cove

854: It is accepted that the current Masterplan for Cove is outdated and it has limited status in decision making following the review of the Local Development Plan 2012. The suggestion that it takes in wider areas has its merits – there is already a Development Framework in place for OP59 Loirston and the Proposed Local Development Plan requires a joint Masterplan for Aberdeen South Harbour and the Energy Transition Zones at Bay of Nigg (OP56, OP61 and OP62). Any update of the Cove Masterplan should at least take

into consideration developments in the wider area, including those which have recently been consented. Although any update is outwith the scope of the Examination, it would be subject to public consultation, either independently or as part of a planning application, which would allow these issues to be considered. Alternatively, the Planning (Scotland) Act 2019 (CD XX) allows community groups to prepare Local Place Plans which could enable proposals for the area being taken forward through this means.

OP107 East Tullos Gas Holder

150, 157: OP107 was first identified in the extant Local Development Plan 2017. The site has planning permission and the energy from waste plant is currently under construction. Further information on the project is available at the website www.nessenergy.co.uk. This site provides responses to the most commonly asked questions and includes the minutes of the stakeholder meetings where air quality was a common topic.

OP59 Loirston

Objections to the Site

393, 394, 395, 475, 476, 924: This site was first identified in the Local Development Plan 2012 (CDXX) and again through the extant Local Development Plan 2017. The site has planning permission in principle and the second iteration of the Loirston Development Framework was approved by Aberdeen City Council in 2020. The principle of development on the site is therefore long established.

The allocation of this site contributes to the housing allowances of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and the maintenance of an effective five year Housing Land Supply. Whilst we would acknowledge a downturn in the current economic climate, the Strategic Development Plan sets out requirements for the next 20-25 years. It is likely that economic conditions will vary over that period and it is important that development opportunities are in place to accommodate any upturns. The matter of demand for housing is discussed in more detail under Issue 2 - Housing Land.

It is acknowledged that Loirston Loch and immediate environs and Kincorth Hill to the north of the site are designated as Local Nature Conservation Sites (CDXX). Parts of Kincorth Hill is also a Local Nature Reserve. These areas are indicated on the reverse of the Proposed Local Development Plan's City Wide Proposals Map. In order to avoid negative impacts on these areas the boundary of the site excludes Kincorth Hill to the north from the allocation, and it remains in the plan as Green Belt and Green Space Network. Loirston Loch and its immediate environs are designated as Green Space Network. Therefore, all land free from constraints has been identified for development and the Masterplan for this site works within these parameters. The Proposed Local Development Plan has made use of Green Space Network to show where impacts resulting from development should be mitigated and where environment needs to be considered. Further mitigation measures on wildlife and environmental issues are set out in the Environmental Report (CD__). The Green Space Network identifies a green link between Kincorth Hill, Loirston Loch and to the coast. This will provide continued recreational opportunities in the area.

Environmental, wildlife and infrastructure matters have been considered in previous examinations and the Development Framework. Further scrutiny of these matters will take

place in subsequent detailed planning applications. Any application will be subject to Local Development Plan policies on these matters.

A traveller site has been part of the Loirston proposal since it was first identified in the Local Development Plan 2012 (CDXX) and a site now has planning permission. Loirston is one of three sites identified in the Proposed Local Development Plan for gypsy / traveller accommodation – the other two being at Newhills and Grandhome. These three sites were chosen to provide a geographical spread of sites with one in the north (Grandhome), one to the west (Newhills) and Loirston to the south of Aberdeen.

1174: In terms of health care provision and the impact on local services, Section 4 of the Proposed Local Development Plan includes a table of infrastructure requirements which include Loirston. On page 43 of the Proposed Local Development Plan it indicates that the development of OP59 will require the following: extension to Cove Bay Health Centre to accommodate three additional new GPs, extension at Cove Bay Health Centre to accommodate two additional Dental Chairs and one new Community Pharmacy.

Support and Amendments to OP59 Loirston

591, 907: This Proposed Local Development Plan must be consistent with the requirements of the Aberdeen City and Shire Strategic Development Plan 2020 in order to comply with Section 16 (6) of the Planning etc (Scotland) Act. This means it has to allocate housing and employment land in accordance with Tables 1 to 4 of the Aberdeen City and Shire Strategic Development Plan 2020. The figures used for allocating sites in the Proposed Local Development Plan should be as precise as possible in order to be able to demonstrate compliance. The allocation of 1500 houses and 11 hectares of employment land for Loirston has been consistent since it was first identified in the Aberdeen Local Development Plan 2012. Our approach provides clarity, consistency and confidence for both developers and the public.

It has been suggested that the employment land element of OP59 should be replaced with a mixed-use zoning. Table 4 of the Proposed Local Development Plan sets out the Employment Land Allocations which are consistent with the requirements of the Aberdeen City and Shire Strategic Development Plan 2020. We would accept that both the local and national economy is facing difficult times for various reasons and this is making life difficult for many businesses to operate. This means it is even more important to protect the interests of businesses. The primary way that the planning system can do that is to ensure that there is a generous and varied supply of dedicated employment land available at all times. In addition, it is important to ensure that larger developments, like Loirston, should include both housing and employment elements and that mixed-use communities are encouraged. This helps to reduce travel requirements, encourages walking and reduces car-dependence. Furthermore, an appropriate mixture of uses could be acceptable in residential areas, provided they are compatible with residential uses.

More details of what is to be expected at OP59 is set out in the Loirston Development Framework (CD___). It is not necessary to repeat some of the detail suggested by respondent 907. Furthermore, the details of a large development are likely to change over time and this has happened at OP59 where the Development Framework is now on its second iteration. Such details are more appropriately expressed in a Development Framework or Masterplan and they can also be more easily amended than a Local Development Plan in response to changing circumstances. For these reasons we would

not wish to amend the diagram on page 35 of the Proposed Local Development Plan, which makes clear its indicative nature.

Reporter's conclusions:

Reporter's recommendations:

Issue 14	ALTERNATIVE SITES: LOIRSTON AND COVE	
Development plan reference:	No reference in Plan	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mactaggart and Mickel Homes Ltd (360) House of Hiranandani (780) Michele V McPartlin of Cove and Altens Community Council (854) Robertson Property (883) HFD Group Ltd (905) Faro Capital Ltd (916) HFD Group Ltd (1145)</p>		
Provision of the development plan to which the issue relates:	Alternative sites in Loirston and Cove	
Planning authority's summary of the representation(s):		
<p><u>Bid Site B1309 - Land at Rigifa</u></p> <p>360: Object to the non inclusion of the site for 100 houses, open space, strategic landscaping and infrastructure. This is the first phase of a larger development. Assessment have been completed, including on the proximity to the quarry. Development is suitable in the location. Site is deliverable. Development bid representation and Main Issue Report representation submitted.</p> <p>854: Agree with the Council that Rigifa B1309 Area 1 is undesirable.</p> <p><u>Bid Site B1310 - Rigifa Farm</u></p> <p>360: Object to the non inclusion of the site for 164 houses, open space, strategic landscaping and infrastructure. Assessment have been completed, including on the proximity to the quarry. Development is suitable in the location. Site is deliverable. Development bid representation and Main Issue Report representation submitted.</p> <p>854: Agree with the Council that Rigifa B1310 is undesirable.</p> <p><u>Bid Site B1311 - Rigifa Area 3</u></p> <p>360: Object to the non inclusion of the site for 40 houses, open space, strategic landscaping and infrastructure. Assessment have been completed, including on the proximity to the quarry. Development is suitable in the location. Site is deliverable. Development bid representation and Main Issue Report representation submitted.</p> <p>854: Agree with the Council that Rigifa B1311 is undesirable.</p>		

Bid Site B1313 - Land at Heathvale

360: Object to the non inclusion of the site for 120 units, comprising a mix of flats and houses, open space, strategic landscaping and infrastructure. Site is deliverable. Development bid representation and Main Issue Report representation submitted.

854: Agree with the Council that Heathvale B1313 is undesirable.

Former OP110 - Wellington Circle

780: Respondent objects to the removal of OP110 (Wellington Circle Retail Park) from the Proposed Local Development Plan. The allocation within the extant Local Development Plan 2017 allows for change of use to Class 1 retail which respondent wishes to remain.

Bid Site B1315 - Wellington Road / Hareness Road

883: The site is currently zoned for Business and Employment however due to current market conditions the respondent sets out that it is unlikely that the site will be used for such purposes. The respondent considers that rezoning the site to H2 – Mixed Use would be in line with Scottish Planning Policy, the Aberdeen City and Shire Strategic Development Plan 2020 and the aims of the Proposed Local Development Plan given it would sustainably reuse an existing brownfield site. Additionally, it would not impact on the Strategic Development Plan's requirements for employment land should it be rezoned. The site was subject to a submission during the Main Issues Report for such a rezoning which the respondent purports was not sufficiently responded to.

New Site – City Park 2 and 3

905: Reallocate area as mixed use. Market and commercial context for office development is poor. Limited residential development in close proximity, site would add to the developing mixed use of the area. The Proposed Local Development Plan rezoned Cloverhill to residential. Site is brownfield. Site is in close proximity to open space. The Employment Land Audit 2019 notes there is sufficient office accommodation. Unsure if industrial uses will be supported due to proximity of residential housing. Note transport infrastructure will require to be upgraded.

1145: Re-zoning of Business and Industrial Land at City Park 2 and 3, Altens. Significant changes to the Aberdeen office Market exacerbated by the ongoing Covid-19 crisis. Recent appraisal concludes that the above sites are no longer viable for office development, but market interest exists for industrial or residential uses. Uncertainty regarding surrounding land uses – land to the south of Hareness Road promoted for mixed use, while retail is being promoted at City Gate 1 (note that there is a planning application pending consideration for a retail unit). Further uncertainty surrounding the Shell HQ to the north west of site. Employment Land Audit shows 222 hectares of marketable employment land, of which 52 hectares is immediately available. This does not include vacant sites. Planning Authority believes that a wide range of employment land and sites is already on offer and sees no need to identify more.

An overview of City Park site is given and a plan is attached showing the relevant sites and land ownership.

Land at Wellington Circle

916: Rezone to mixed use (or equivalent) to reflect current mix of uses on site and in the surrounding area and to support a wider range of uses. Mixed use zoning will support the existing residential land uses, and land release in the area. Area has good active travel network and will act as a transitional zone between neighbourhoods. Restrictive nature of policy B1 is resulting to long term vacant units. There is an over supply of employment land. The Policy B1 zoning sits in the middle of several mixed uses and directing business and industrial development here will lead to conflict with wider uses. Other area within the city set a precedent for this – Bucksburn Roundabout.

Undesirable Bid Sites

854: Agrees with the Council that the following development bids are considered undesirable:

- B1301 Blackhills of Cairnrobin
- B1303 Loirston
- B1305 Loirston
- B1305 Land at Peterseat Drive
- B1306 Charleston part of OP60
- B1312 Wellington Road East
- B1315 Wellington Road
- B1317 Mains of Charleston

Modifications sought by those submitting representations:

Bid Site B1309 - Land at Rigifa

360: Identify site as an opportunity site for a residential development of 100 homes. Amend Table 3: New Housing Allocations for 2020-32 to take account of this.

Bid Site B1310 - Rigifa Farm

360: Identify site as an opportunity site for a residential development of 164 homes. Amend Table 3: New Housing Allocations for 2020-32 to take account of this.

Bid Site B1311 - Rigifa Area 3

360: Identify site as an opportunity site for a residential development of 40 homes. Amend Table 3: New Housing Allocations for 2020-32 to take account of this.

Bid Site B1313 - Land at Heathvale

360: Identify site as an opportunity site for a residential development of 120 homes. Amend Table 3: New Housing Allocations for 2020-32 to take account of this.

Wellington Circle

780: Amend Appendix 2 under the heading 'Loirston and Cove' to reinstate OP110 Wellington Circle (Former Makro) as an Opportunity Site encompassing 3.2 hectares, suitable for change of use to Class 1 retail. Update the Proposed City Wide Proposals Map to reflect this opportunity site or remove the existing Business and Industrial designation and replace with Commercial Centre designation.

New Site - Site to the South East of the A956 and Hareness Road

883: It is requested that a review of the plans for this corridor are given by the Council to properly reflect the market context in which we are planning for. It is also specifically requested that relation to Robertson Property's interest the land at Hareness Road is rezoned from Business and Industry B1 to Mixed Use H2 to provide flexibility to a range of positive uses to bring the site back into use.

New Site – City Park 2 and 3

905: Rezone City Park as Mixed use. Rezone City Gate as Retail

1145: The Proposed Local Development Plan should note that the future development of the City Park holding will now include non-employment uses to reflect changed market conditions. The Proposed Local Development Plan should acknowledge that the City Gate site is likely to come forward for retail development.

The two City Park sites should be subject to a mixed-use land use allocation to include housing and possible improvements to adjacent public open space as part of an overall redevelopment strategy.

Land at Wellington Circle

916: On the City Wide Proposals Map, rezone Wellington Circle to Mixed use

Summary of responses (including reasons) by planning authority:

Bid Site B1309 - Land at Rigifa

360, 854: The merits of development in the Rigifa area have been rejected at the last two Local Development Plan Examinations (CDXX and CDXX – Issues XX). There has been little significant change in circumstances over that period to warrant a different view now. We would therefore agree with respondent 854 that all three sites remain undesirable.

Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Development Options Assessment Report (CD__). The site is zoned as Green Belt and Green Space Network.

Residential development here will not be adding to the mix of land uses in the area. There are no local facilities nearby and Charleston Primary School is forecast to go over capacity in 2021 (CD__ School Roll Forecasts), and will be over capacity at 159% in 2025, which is a constraint to the development. The Blackhills Quarry sits within 400 metres of the site and this may have land use conflict issues (quarry blasting), especially as the

development proposed is residential. The site acts as a buffer between Cove and the quarry.

The openness of the site provides a clear contrast between the agricultural landscape to the south of Cove Road and the residential areas to the north. Despite the development of the Aberdeen Gateway Business Park to the south-west and the presence of Blackhills Quarry to the south, this rural character remains apparent. The site therefore contributes positively to the landscape setting of Cove. Cove Road at this point also forms a particularly strong Green Belt edge, whereas the site boundaries proposed in the representation do not correspond to any existing features on the ground.

Bid Site B1310 - Rigifa Farm

360, 854: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Development Options Assessment Report. The site is zoned as Green Belt and Green Space Network.

The development of housing will not be adding to the mix of land uses in the area, however the potential development of commercial or health club use will be contributing to more of a balance of uses. There are no local facilities nearby and Charleston Primary School is forecast to go over capacity in 2021 (CDXX). The Blackhills Quarry sits within 400 metres of the site and this may have land use conflict issues (quarry blasting), especially as the development proposed is residential.

The site also sits within an area of land designated as Green Belt which acts as a buffer between Cove and the quarry. The openness of the site provides a clear contrast between the agricultural landscape to the south of Cove Road and the residential areas to the north. Despite the development of the Aberdeen Gateway Business Park to the south-west and the presence of Blackhills Quarry to the south east, this rural character remains apparent. The site therefore contributes positively to the landscape setting of Cove. Cove Road at this point also forms a particularly strong Green Belt edge, whereas the site boundaries proposed in the representation do not correspond to any existing features on the ground.

Bid Site B1311 -Rigifa Area 3

360, 854: Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Development Options Assessment Report (CDXX). The site is zoned as Green Belt and Green Space Network.

Residential development here will not be adding to the mix of land uses in the area. There are no local facilities nearby and Charleston Primary School is forecast to go over capacity in 2021, and will be over capacity at 159% in 2025, which is a constraint to the development (CDXX). The Blackhills Quarry sits within 400 metres of the site and this may have land use conflict issues (quarry blasting), especially as the development proposed is residential. The site acts as a buffer between Cove and the quarry and business park to the south.

The openness of the site provides a clear contrast between the agricultural landscape to the south of Cove Road and the residential areas to the north. Despite the development of the Aberdeen Gateway Business Park to the south and the presence of Blackhills Quarry to the south east, this rural character remains apparent. The site therefore contributes

positively to the landscape setting of Cove. Cove Road at this point also forms a particularly strong Green Belt edge, whereas the site boundaries proposed in the representation do not correspond to any existing features on the ground.

Bid Site B1313 - Land at Heathvale

360, 854: The merits of development in the Heathvale area was rejected at the last Local Development Plan Examination (CD___). There has been little significant change in circumstances over that period to warrant a different view now. We would therefore agree with respondent 854 that the site remains undesirable.

Aberdeen City Council has assessed this site, considered it undesirable, and rejected it on the grounds set out in the Development Options Assessment Report (CDXX).

The site is zoned as Urban Green Space and Green Space Network and has tree cover as part of Charleston Wood. There are indications of priority species habitat on site. The site plays a positive role in the Green Space Network by improving the visual amenity of this important approach into Aberdeen, particularly due to its relationship with Loirston Loch to the west and links beyond into open countryside. The site is located immediate next to Wellington Road, A956, and there are potential land use conflict with noise. The site is remote from existing services and facilities. The site is zoned to Charleston Primary School which will be over capacity by 2021 (CDXX). Part of site (Charleston Wood) is identified as potentially contaminated (Charleston landfill). The areas immediately to the south of the site is also identified as potentially contaminated.

Former OP110 - Wellington Circle

780: We would accept that there is now a mix of retail, commercial and drive-through facilities established on site. The respondent notes a number of planning consents which have been granted on site over the last few years. These can now be regarded as established uses so the business and industrial policy designation should not hinder any future amendments to these uses, which are now well established. The purpose of the Local Development Plan Opportunity Sites is to identify new proposals and uses for a site. The Opportunity Site OP110 was identified in the extant Local Development Plan 2017 and the proposed uses are now consented and built. There is therefore no need to continue to identify the area as an opportunity site.

Bid Site B1315 - Wellington Road / Hareness Road

883: Aberdeen City Council has assessed this site, considered the proposal undesirable, and rejected it on the grounds set out in the Development Options Assessment Report (CDXX).

The site comprises a 0.83 hectare site located within a prominent corner of the Altens Industrial Estate, next to the roundabout with Wellington Road and Hareness Road. The site is zoned Business and Industrial at present; the proposal is for a mixed use zoning to be applied. The previous use on site was a hotel which has been demolished. Wellington Road forms a strong boundary in this area which separates business and industrial uses to the east 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.

New Site – City Park 2 and 3

905, 1145: The Council does not support the re-zoning of these sites. They were not put forward as a development bid so were not considered as such at the Main Issues stage, nor were they subject to site assessment or public consultation.

The north eastern part of the site (the area marked yellow in the representations) is zoned as Green Belt and Green Space Network. Some of it is part of the Tullos Hill Local Nature Conservation Site (CDXX). Cat Cairn is a Scheduled Monument which is located to the north east corner of the site (CDXX). The land contributes to the landscape setting of Tullos Hill and the setting of Cat Cairn. Tullos Hill is used for informal recreation and provides a green backdrop to the industrial areas to the north west and south east. As a result it should remain zoned as Green Belt and Green Space Network.

The two remaining areas (marked pink and blue in the representations) are zoned as Business and Industrial Land. Wellington Road provides a strong boundary which separates the industrial areas to the east from the residential areas to the west. Rezoning these areas would create an isolated island of mixed use zoning, within the wider business and industrial zoning.

Land at Wellington Circle

916: The Council does not support the re-zoning of this area. Most of it remains in business and industrial uses. Balmoral Business Park covers much of the southern half of the area. The central northern area is dominated by distribution uses with associated heavy traffic uses. The central area (the former OP110 Opportunity Site) has been considered in the response above. It is accepted that there are alternative uses and a number of vacant units in the area. However, the introduction of further alternative uses could potentially lead to conflicts with existing uses. It is also accepted that post-covid economic conditions are likely to be difficult. This makes it even more important to protect the interests of existing businesses through maintaining a zoning that is favourable to employment uses.

Reporter's conclusions:

Reporter's recommendations:

Issue 15	ALLOCATED SITES: CITY CENTRE AND URBAN	
Development plan reference:	Page 23, Appendix 2, City Wide Proposals Map, City Centre Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Lyn Anderson (23) Michael Sinclair (31) Stewart Riley (45) Rachel McBain (50) Annie Munro (52) Hayley Williams (59) Iwona Kielbowska (61) Craig Mitchell (80) Jakub Ilski (88) James Sinclair (95) Sarah Lorick (116) Catalyst Vineyard Church (118) Barbara McCahery (120) Chris McIntosh (123) Valerie Duguid (124) Daniel Kemp (129) Dorothy Mackay (175) Colin Stevenson (258) University of Aberdeen (474) Trudie Leask (499) Denburn Court Residents Association (518) Scottish Episcopal Church (582) Scottish Government (608) Tamar Weatherly (626) Taylor Curtis (672) University of Aberdeen (714) Torry Community Group (763) Aberdeen Association of Social Service (770) Castlehill and Pittodrie Community Council (843) LSREF3 Tiger Aberdeen S.À.R.L. (C/o Ellandi LLP) (855) Robert Gordon's College (877) NHS Grampian (882) Aberdeen Football Club Plc (944) Michael R Deans (967) Robert Hamilton (971) Julie Bray (1018) Eric Kiltie (1036) Jacqueline Hanley (1086) SGN (1101) Daniel Ralph (1118) Palmer Capital LLP (1120) David Fryer (1123) Lesley Richardson (1126)</p>		

The New Aberdeen Mosque and Community Centre Project (1146)
Hugh Davies (1155)
Ian Hall (1193)

Provision of the development plan to which the issue relates:

Opportunity Sites within the area

Planning authority's summary of the representation(s):

OP35 - Summerfield House, Eday Road

116: The respondent works at OP35 and lives close to it. They are unsure how to comment on a potential development site where they work.

882: This 1.1 hectare site is identified as a brownfield opportunity for residential use. The respondent welcomes the inclusion of this site for residential use and this should continue to be identified going forward.

OP36 – Charlie House

882: The respondent supports the 1.5 hectare site is identified for a children's respite centre and interactive garden area.

OP37 – Woodend Hospital

124: The respondent does not support the development of OP37 as they are concerned with its impact on infrastructure in the surrounding area. The respondent states there is limited educational and road capacity left for more development.

882: The respondent welcomes the inclusion of this site in the Proposed Local Development Plan as a brownfield residential opportunity on part of the hospital site. This should continue into the Local Development Plan.

1126: The respondent notes that 300 homes at OP35 Eday Road are currently under construction. OP37, on top of Eday Road and Maidencraig, will cause more gridlock. Note that the Lang Stracht is frequently blocked from end to end. Also note congestion in this area caused by Countesswells.

The respondent considers it would make more sense for housing in town to be refurbished before new homes are built on the perimeter causing residents to commute via private car. Also note congestion in this area caused by Countesswells.

OP66 Granite Hill

1193: The respondent raises concerns of traffic congestion in the existing roads infrastructure and on schooling implications for 300 dwellings. Concerns over lack of affordable housing.

OP69 - 152 Don Street, Old Aberdeen

61, 474: The respondents consider the site OP69 is a suitable brownfield site for development.

120: The respondent does not think that given the impacts of Brexit, the pandemic and the downturn in Oil and Gas that there will not be demand for new homes at OP69. The respondent states that the population of Aberdeen is declining and that there is also a drain of younger people from the Region. There are also numerous vacant homes for sale.

120: The respondent believes that there are more beneficial uses for brownfield sites than housing and that these uses would benefit the community more. The respondent is concerned with the potential traffic from development.

971: The site has poor road infrastructure. King Street/Don Street junction is overcrowded at peak times and is hazardous. Narrow access road cannot sustain more increased use.

1086: No issues with housing at this location. Comments submitted relating to detail: Concerned about height of flats. Height should be no more than 3 storeys. Concerned about loss of view across trees to Seaton Park, as the view helps with mental health. Concerned about noise from construction. Concerned about use of new flats, and potential anti social behaviour. Trees on and adjacent to site should be retained. Concerned about loss of green infrastructure.

OP70 - Denburn Valley: City Centre Masterplan Intervention Area

118, 967: The respondents have concerns that the development of OP70 will impact on parking provision at the Denburn car park. Respondent 967 asserts that the Council has a 'duty of care' to provide sufficient spaces for Denburn Court residents.

518: The respondent asks - how will the cultural heart of Aberdeen be shaped and protected by the Proposed Local Development Plan to make residents and visitors proud. Respondent suggests new development should be attractive and complimentary to the area. Respondent critical of commercially driven mixed use development proposed for Denburn Court. Development should not be a magnet for anti-social behaviour. Residents need to feel safe. New housing should consider people with special needs. Respondent seeks clarification of what "refurbishment of Denburn" means and ask what is envisaged. Respondent values the area known as the Quad around Denburn Court, and states this area should be retained. Respondent asks what charging facilities are envisaged for Denburn Car Park area. Respondent asks what the timescales are for the re-development of the Denburn car park area and what is envisaged. Respondent asks how much development will be private sector and which areas will be Aberdeen City Council.

OP76 - Former Raeden Centre

882: A 1.48 hectare site is identified for residential use and NHS Grampian welcomes this designation. It should continue into the Local Development Plan.

OP77 - Cornhill Hospital

1101: The respondent notes the United Kingdom Government's statements regarding climate change and has reviewed the Proposed Local Development Plan and Delivery Programme to identify areas of concern for their network. Sites that would connect to the supply from the north have the potential to trigger a main lay reinforcement on the Intermediate Pressure network.

This site has either commenced or could start construction prior to 2025 and this development could trigger the requirement for reinforcement.

Reinforcement of the existing Low Pressure (LP) network may be necessary to support development on this scale, dependent on the final point of connection to SGN's network. Only when a connection request has been made to SGN will we know if reinforcement is required on the LP.

SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a 'first come, first served basis'.

OP78 - Frederick Street

882: Respondent welcomes the inclusion of this site for mixed uses.

OP80 - Mastrick Clinic

882: Respondent welcomes the inclusion of this site as a Neighbourhood Centre where supporting uses are encouraged.

OP82 - Dunbar Halls of Residence, Don Street

714: Support for continued allocation of OP82. Site has been allocated in three Local Plan iterations since 2008. Site is cleared, vacant brownfield defined by defensible boundaries on all sides. Site benefits from range of modes of sustainable transport and within walking distance of other services. Redevelopment will increase permeable travel for pedestrian and cycle access. Site is of limited ecological or recreational value and sensitive redevelopment will make positive contribution to character and functionality of the area. Its redevelopment will respect the historic townscape recognising character and amenity of existing adjacent properties. Site has received market interest and can be completed/commenced during lifetime of new Local Development Plan. Proposed Local Development Plan modifies previous allocation description to now allow mainstream housing which is welcomed and can contribute towards strategic housing requirements, regenerate brownfield sites in line with the strategy in the Local Development Plan. Marketing particulars submitted with representation.

971: Site is in a Conservation Area - any development should be high quality and must reflect the sensitivity of the area. Site is a wildlife haven - any development should try to preserve this wildness by being low density.

1036: Respondent objects to OP82 - Dunbar Halls of Residence. Concerns raised regarding the area being a conservation area, impact on ecosystems and biodiversity including protected species, potential impact on the integrity of St Machar's Cathedral, the capacity of the existing road system could not support additional traffic, a previous

application for this site was refused in 2004. Respondent also states that a full archaeological survey would be required prior to any development.

OP83 - Urquhart Building, City Hospital

882: NHS Grampian welcomes the inclusion of this site as a residential opportunity which would allow the re-use of this listed building.

OP84 - Resource Centre, City Hospital

882: NHS Grampian welcomes the inclusion of this site for small scale, commercial or office use.

OP85 - King Street/Beach Esplanade

1146: Wording of 'other factor' is unhelpful. Inclusion of "or if a decision is made not to pursue them" as this will occur. Wording should be amended.

OP87 - Pittodrie Park

258: The respondent considers that flats over 3 storeys would disrupt the view from their dwelling, and the views of other residents in the area.

944: Support the allocation of the site.

118: Object to the allocation of 6.0 hectares for residential development on this site. Do not consider that the development will provide low cost housing that would benefit those in need of affordable housing, but rather it will likely offer yet more 2-3 bedroom "executive" properties. More high-cost, mid-quality properties are not required.

Note that the Aberdeen property market has been under strain for many years. Note that the number of flats on Aberdeen Solicitors Property Centre (ASPC) has been very high for several years. Note that, despite this, there have been a number of new residential and student accommodation developments in the area surrounding this site over the last few years (a number of different examples are given). Consider that this puts further pressure on house prices, which can impact on people's lives, e.g. as people can't afford to move or re-mortgage.

Currently there are 178 properties for sale within a 0.5 metre radius of Pittodrie, plus another 52 listed for rental, and there are likely to be others on other agency websites. Query why more development is planned in this context? What product is being offered that can't be met within the existing housing stock? Consider that more development will impact further on house prices, causing more people to enter into negative equity.

OP89 - Kaimhill Outdoor Centre

31, 129: The respondents are opposed to the development of OP89 Kaimhill Outdoor Centre as it will result in the loss of an area of much used local green space and reduce the amenity of the area which would impact on mental health. The respondents do not consider there is a need for additional homes and that the site would be better use for community gardens or improved public spaces.

31: The respondent considered the development of 35 homes at OP89 Kaimhill Outdoor Centre to be an overdevelopment of the site. Such development would likely be multi-storey in nature and result in loss of light.

OP84 - Resource Centre, City Hospital

59: The respondent is concerned that the development of OP84 will lead to the loss of habitat for a colony of rabbits.

OP93 - Former Summerhill Academy

123: The respondent does not support the development of OP93 as they are concerned with its impact on infrastructure in the surrounding area. The respondent states there is limited medical, educational and road capacity left for more development. (There may be confusion on the respondent's part that OP93 is a different site to Summerhill, under construction)

672: Concerns regarding existing construction works at site relating to parking, congestion, accidents, road cleaning and noise. Solution to construction issues outlined include addressing waiting construction traffic, double parking, cleaning truck routine and cleaning subsidies.

1101: SGN notes the UK Governments statements regarding climate change and has reviewed the Proposed Local Development Plan and Delivery Programme to identify areas of concern for their network. Sites that would connect to the supply from the north have the potential to trigger a main lay reinforcement on the Intermediate Pressure network.

This site has either commenced or could start construction prior to 2025 and this development could trigger the requirement for reinforcement.

Reinforcement of the existing Low Pressure (LP) network may be necessary to support development on this scale, dependent on the final point of connection to SGN's network. Only when a connection request has been made to SGN will we know if reinforcement is required on the LP.

SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a 'first come, first served basis'.

OP95 - Station Gateway City Centre Masterplan Intervention Area

843: The respondent states it needs to be ensured there will be public transport and pedestrian linkages between Union Square, Harbour, the City Centre, West End, East End and Castlegate.

Ensure there are accessible routes to and from the bus and train station, and from Union Square car parking to the wider city. This will support active travel, and be of commercial and economic benefit.

855: Supports the allocation of OP95 which makes specific reference to the regeneration and the City Centre Masterplan but asserts that further links could be made between the Proposed Local Development Plan and the City Centre Masterplan. Such amendments would further enhance the likelihood of City Centre regeneration.

OP96 - Castlegate and Castlehill City Centre Masterplan Intervention Area

46: The respondent considers the policy changes which relate to OP96 are vague. The respondent considers that the area is an underutilised space which would suit restaurants and cafes rather than pubs.

95: The respondent queries the exact location of where the possible 46 residential units will go.

770: Respondent welcomes allocation of OP96 Castlegate and Castlehill City Centre Masterplan Intervention Area, although not at the detriment of vulnerable people who access the services of Voluntary Service Aberdeen. Respondent wants to ensure that their comments regarding accessibility to their premises are taken into account in applications for future developments.

OP98 - VSA Gallowgate

582: Development should consider the historic and protected nature of the site, and of the Category B listed Church in close proximity. Comments note the kirk's intention to develop in conjunction with a Registered Social Landlord (RSL).

OP99 - Old Torry

50: The respondent queries what development is planned for OP99 and implications for current residents.

175: The respondent considers that Old Torry Area needs to be tidied. The respondent states that the area is already developed. Details sought on future of vacant buildings such as the old lemonade factory. The respondent has concerns regarding location of a wind turbine location. Concerns regarding the future of the Marine Lab. Road infrastructure needs to be improved and maintained. Respondent cannot find the proposed development plan of Torry online.

499: Respondent suggests that OP99 Old Torry should be used for an Urban Wildlife Garden. More housing would result in overdevelopment and the loss of open space.

608: Marine Scotland intends to remain on site for the foreseeable future. There may be redevelopment to accommodate their future needs within the existing use and improve public accessibility to the site.

626: Open "waste" ground below Abbey Road (between Mansefield Road and Baxter Street) should be retained as open space. This land is detoxifying after contamination and has natural heritage and biodiversity value, including protected species. This ground acts as buffer for sound and noise pollution from Aberdeen Harbour.

763: Respondent feels that this site is unnecessary given other housing developments in the area and would result in shading and loss of light to existing properties on Abbey Road. Respondent raises concerns regarding the impact development would have on protected species.

1123: The respondent considers that the site should be designated as green space for a wildlife park. The site has had a long term industrial designation but has not has a formal

use for decades. It is asserted that the site is heavily polluted through contamination. The site is becoming naturalised through re-seeding and colonisation by wildlife. Industrial and residential use would require significant spending for re-remediation works to make the site safe. These works would result in a cost to health and wellbeing and therefore would have an adverse effect on the local community.

Allowing the site to naturalise would have no cost and allow for environmental benefits.

The respondent references Nature Conservation (Scotland) Act 2004 and Scottish Biodiversity Strategy (2004) and advises that the site is home to wildlife and is sufficiently large and secure enough for them to rarely encounter people.

Climate Change: Site acts as a green lung and provides a partial shield from the emissions from boats within the harbour.

- Text shows reductions CO2 emissions in September 2019 and July 2020.
- The naturalisation of this site aids and improves the environment.
- Regeneration Communities
- Torry is within the 10% most deprived areas and reclaiming of a brownfield site for environmental use all helps quality of life, health and wellbeing.

1155: OP99 should not be developed and should be made green space and developed into an Urban Wildlife Garden.

OP100 - North Dee: City Centre Masterplan Intervention Area

52: The respondent is concerned that the proposed development in the Torry area at OP100 will result in the loss of amenity space from the community of Torry.

80: The respondent is concerned with how long the development of OP100 will result in construction noise. The respondent requests additional information relating to the duration of construction noise.

1120: Supports the continued allocation of OP100 in the Proposed Local Development Plan. While supporting the allocation the respondent requests that there are some amendments to the site description and the policy context. Such changes are requested as the respondent sets out in their submission how the commercial rental market has been affected by the downturn in the Oil and Gas sector thus reducing the demand for new office space. The respondent considers that in the current market the site would be more deliverable with a greater emphasis on residential development.

OP102 - George Street / Crooked Lane

877: The respondent makes a submission in relation to Appendix 2, City Centre and Urban Areas, p.123 and specifically OP102 which is adjacent to Robert Gordon's College. The respondent states that student entry is in close proximity and that any future development should take this into consideration.

OP106 - Torry Waterfront: City Centre Masterplan Intervention Area

23: The respondent is concerned that the scale of the proposal will have an impact on amenity of the River Dee area between Victoria and Wellington Bridges, wildlife and green space in the area. Riverside area will be overshadowed by the development. Notes amount of flats in area already.

88: The respondent is concerned that the development of OP106 will impact on the access to their property. The respondent wants surety that access will be maintained.

OP116 - Froghall Terrace

1018: The respondent states that an increase in buildings in the area has had an impact on traffic and requests that any development here is low level and that there is sufficient parking.

Modifications sought by those submitting representations:

OP37 – Woodend Hospital

1126: The Proposed Local Development Plan should be modified so that homes nearer town are refurbished.

OP69 - 152 Don Street, Old Aberdeen

971: The respondent requests that the Proposed Local Development Plan must improve the road infrastructure around 152 Don Street, Old Aberdeen OP69 or implement restrictions on car ownership. The Proposed Local Development Plan should be amended so that OP82 and OP69 are considered together as planning developments as both use the same access route. Planners should consider that the Proposed Local Development Plan was drafted pre-Covid, there are different needs now which need to be addressed.

OP70 - Denburn Valley: City Centre Masterplan Intervention Area

118: Car parking at OP70 should not be altered.

OP82 - Dunbar Halls of Residence, Don Street

714: Retain allocation of OP82 for student or mainstream residential use.

971: The respondent considers that the minimum number of houses per hectare should be reduced to allow low density developments. The development should preserve existing wild areas to maintain biodiversity. Road infrastructure must be improved or restrictions on car ownership made. OP82 and OP69 should be considered together as planning developments as both use the same access route. Planners should consider that the Proposed Local Development Plan was drafted pre-Covid, different needs now need to be addressed.

1036: Remove OP82 from the Proposed Local Development Plan.

OP84 - Resource Centre, City Hospital

59: The colony of rabbits should be relocated if development is to take place.

OP85 - King Street/ Beach Esplanade

1146: Amend 'Other Factors' of OP85 to read: *"Site is identified by Council resolution for a Mosque, community facilities and open space. Until proposals for these uses are progressed the existing open space use will be protected by Policy NE2 Green and Blue Infrastructure (Urban Green Space)"*.

OP87 - Pittodrie Park

1118: Reduce residential development in an area that doesn't require it. Suggest that the land be put to another use that's more beneficial to the local community.

OP89 - Kaimhill Outdoor Centre.

31: If development at OP89 is to take place it should be to improve the quality of the park through new community gardens, outdoor facilities and general regeneration of the park.

129: The OP89 be designated a food growing area/communal garden and park improvement.

OP93 - Former Summerhill Academy

123: Do not allocate OP93.

OP95 - Station Gateway: City Centre Masterplan Intervention Area

855: Amend the Proposed Local Development Plan to align more with the City Centre Masterplan.

OP96 - Castlegate and Castlehill: City Centre Masterplan Intervention Area

45: Amend the Proposed Local Development Plan to promote a café/restaurant al fresco area around the Castlegate.

OP99 - Old Torry

626: Amend the Proposed Local Development Plan so it won't change this open space (open "waste" ground below Abbey Road (between Mansefield Road and Baxter Street). Leave it to become an untouched natural place.

763: Develop Abbey Road section of OP99 as an Urban Wildlife Garden/Green space.

1123: To allow the site to be remediated by nature, re-populated with wildlife and protected by law.

OP100 - North Dee: City Centre Masterplan Intervention Area

52: Do not develop parkland in Torry and instead develop Altens

1120: With regard OP100 Amend the policy section of Appendix 2 for OP110 to read: *"Mixed Use, Urban Green Space, Green Space Network and Land for Transport"*

Amend the Other Factors section of Appendix 2 for OP110 to read: *"New Urban residential and class 4 Business Quarter with a high quality and imaginative approach to the public realm, creating permeable pedestrian linkages between the city centre and the River Dee. Development Framework in partnership with Aberdeen City Council required demonstrating imaginative community engagement and showing an appropriate mix of compatible new uses at ground floor level , including 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). Refurbishment of the listed smoke houses. Pedestrian bridge linking into OP106 Torry Waterfront. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee SAC. As part of this process it is likely a Construction Environmental Management Plan will also be required"*

OP102 - George Street / Crooked Lane

877: It is requested the Proposed Local Development Plan includes recognition of OP102's proximity to student entry and requires any future development on OP102 to have regard for the College's operations and safety of its pupils.

OP106 - Torry Waterfront: City Centre Masterplan Intervention Area

23: Reduce the scale of development and ensure riverside and play park access is maintained.

88: Respondent needs surety that there will be continued access to their property should development take place.

Summary of responses (including reasons) by planning authority:

OP35 - Summerfield House, Eday Road

116: The Council cannot comment on a conflict of interests on behalf of the respondent.

882: Support for the allocation noted.

OP36 – Charlie House

882: Support for the allocation noted.

OP37 – Woodend Hospital

124, 1126: The development of housing at OP37 will be limited to a component of the site as there are a number of features such as Listed Buildings, trees and open space which require sensitive treatment. The site is a brownfield allocation in an established area which is close to existing infrastructure and established public transport routes along the Lang Stracht and the A944. The site is in walking distance to community facilities and retail services. Woodend Hospital in its use as a healthcare facility would have generated significant traffic movements per day and it is considered more than residential development. It is likely that the proposed allocation will result in lower traffic movements.

An Aspirational Core Path, as shown on page 28 of the Core Paths Plan 2009 (CD XX) runs along the northern boundary of the site.

With regard to existing development at Maidencraig and Countesswells, detailed assessments were undertaken at both Masterplanning stage and also during the assessment of planning applications to consider the infrastructure contributions required to mitigate the impact of new development. Both developments are to make contributions towards the upgrade of junctions along the A944 and contributions to primary and secondary education. This is set out in Section 4 of the Proposed Local Development Plan.

A traffic impact assessment will be required to support any future planning application for development at OP37 Woodend Hospital. This will determine what potential impact and mitigation may be needed for development. A similar process will occur with regard education infrastructure should a future planning application be lodged. Sufficient contributions will be required in order to address any potential impact.

In terms of addressing traffic levels, the Transport Section of the Proposed Local Development Plan includes Proposed Policy T2 – Sustainable Transport which aims to reduce the use of the private car and to increase active travel and public transport use. Additionally, this long-term vision of reduced car usage is echoed in the Local Transport Strategy 2016-2021 (CD XX) and the NESTRANS Regional Transport Strategy 2040 (CD XX) which would influence the design of any future development proposal.

882: Support for the allocation is noted.

OP66 - Granite Hill

1193: OP66 Granite Hill is a brownfield allocation in an established area. The site is a former industrial area which is currently vacant. As such, is it close to public transportation links along Quarry Road with the No. 13 Bus. There are existing, retail, community services and public open spaces within close proximity. With regard potential increased traffic of the Proposed Local Development Plan includes Proposed Policy T2 – Sustainable Transport which aims to reduce the use of the private car and to increase active travel and public transport use. Additionally, this long-term vision of reduced car usage is echoed in the Local Transport Strategy 2016 – 2021 (CD XX) and the NESTRANS Regional Transport Strategy 2040 (CD XX) which would influence the design of any future development proposal.

Concerns relating to education infrastructure are noted and have been specifically referred to in the Proposed Local Development Plan's other factors column of Appendix 2. With regard provision of affordable housing, any development proposal which comes forward will be required to make contributions towards affordable housing in line with the Proposed Local Development Plan's Policy H5 – Affordable Housing and the requirements of paragraph 129 of Scottish Planning Policy (CD XX).

OP69 - 152 Don Street, Old Aberdeen

61, 474: The respondents support for the allocation are noted.

120: Table 3: Local Development Plan Housing Allowances sets out the housing allowances required for the Proposed Local Development Plan for the period 2020-2032. The Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) is a statutory document and the Proposed Local Development Plan is required to conform with it. As such the new housing allocations set out in Table 3, page 23, of the Proposed Local Development Plan are in line with the requirements of the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). While it is not disputed that there has been a downturn in the regional economy and that there has been recent population decline in Aberdeen City, such circumstances may be in the short to medium term. The recent trend of net annual migration out of Aberdeen City has stopped with National Records for Scotland figures showing an inward migration of over 800 people in 2019 (CD XX). It is therefore right that the Proposed Local Development Plan should have a settlement strategy and allowances which align with the statutory planning requirements and the ambitions of the Regional Economic Strategy (CD XX) for a long term sustainable return to economic growth. Such an allocation will help to provide a range and mix of housing allocations in line with paragraph 119 of Scottish Planning Policy (CD XX).

While there could be alternative uses proposed for the site it is proposed to be residential which is close to open space in Seaton Park and the beachfront, educational facilities at both primary and third level and the Aberdeen Sports Village.

120, 971: OP69 fronts onto King Street (A956) and would be served by multiple established bus routes. With regard potential increases in traffic the Proposed Local Development Plan includes Proposed Policy T2 – Sustainable Transport which aims to reduce the use of the private car and to increase active travel and use of public transport. A traffic assessment would be required to support any future planning application which would ascertain the suitability of safe site entry and egress.

1086: Any future planning application for the development of OP69 would need to consider the residential amenity of the surrounding neighbourhood. There are a suite of policies set out in the Proposed Local Development Plan which consider the components which have caused the respondent concern. Any future development proposal would be assessed against policies such as (but not limited to) Proposed Policy NE5 – Trees and Woodland, Proposed Policy D1 – Quality Placemaking, Proposed Policy D2 – Amenity and Proposed Policy D3 – Big Buildings. It is unlikely that the development of OP69 would result in the loss of green infrastructure given this is outwith the site boundary.

OP70 - Denburn Valley: City Centre Masterplan Intervention Area

118, 967: The allocation of OP70 Denburn Valley aligns with the vision and aims of the Aberdeen City Centre Masterplan and Delivery Programme (CD XX). The components of the regeneration of OP70 are set out in the Proposed Local Development Plan and further detailed in the Aberdeen City Centre Masterplan and Delivery Programme (CD XX) where reference is made to the redevelopment of the Denburn car park.

Car parking provision is recognised as a way of controlling traffic in an area, providing residential amenity and supporting the economy. It is considered within the Local Transport Strategy (CDXX) and the NESTRANS Regional Parking Strategy (CDXX). Outwith Council run carparks there is ample on street parking within the Denburn Valley and throughout the city (CDXX). That aside, any new development proposals for the regeneration of this area will need to conform with the extant transportation and parking policies and local planning guidance at the point of determination.

518: OP70 Denburn Valley has been specifically included in the Proposed Local Development Plan to aid the delivery of the Vision and Aims of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX). The respondent wishes for a City Centre that residents and visitors can be proud of. Page 17 of the Aberdeen City Centre Masterplan and Delivery Programme (CD XX) sets out a Vision for an Aberdeen as “A city centre for a global city” with the summary of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) purpose as “*Energising the city centre to deliver prosperity and better quality of life for all*”. Such aspirations would align with those of the respondent and are now in the stage of delivery through the ongoing regeneration of Union Terrace Gardens.

The Proposed Local Development Plan allocation sets out a mix of uses for the regeneration of OP70 which are not commercially driven rather they offer local services, increased amenity and further housing opportunities. In relation to the refurbishment of Woolmanhill Hospital, Detailed Planning Permission 160802DPP (CDXX) was granted in November 2018 for ‘Proposed change of use to create 42 Residential apartments, a 102 bedroom boutique hotel and associated car parking and landscaping’ and Listed Building Consent 160801LBC (CD XX) was granted in November 2019 for ‘The conversion, including demolitions, alterations and extensions etc, of the former Woolmanhill Hospital site to create 42 residential apartments (including 10 Affordable Housing Units), a 52 bedroom hotel and 27 separate hotel suites, together with undercroft car parking’. Renovations would bring such important features of the city’s-built heritage back to usable and habitable modern standards aiding the regeneration of the area while retaining the historic fabric. Areas of existing public open space would be considered through and future development proposals and it is the intention of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) to increase, improve and green areas of open space.

There are currently no plans for the redevelopment of Denburn Car park. Such plans would be taken forward on the basis of a Council wide car parking strategy.

The delivery mechanisms for the regeneration and redevelopment of components of OP70 Denburn Valley can be undertaken by the Council or the private sector.

OP76 - Former Raeden Centre

882: Support for the allocation is noted.

OP77 - Cornhill Hospital

1101: The site is allocated in the extant Local Development Plan 2017 (CDXX). Content of the submission is noted, and the Delivery Programme (CDXX) can be amended to reflect this.

OP78 - Frederick Street

882: Support for the allocation is noted.

OP80 - Mastrick Clinic

882: Support for the allocation is noted.

OP82 - Dunbar Halls of Residence, Don Street

The site is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried forward to the Proposed Local Development Plan.

714: Support for the allocation is noted.

971, 1036: The allocation of OP82 Dunbar Halls of Residence on Don Street in the Proposed Local Development Plan is a retention of the site's allocation in both the extant Local Development Plan 2017 (CD XX) and the previous Local Development Plan 2012 (previously known as OP101). The principle of the allocation of OP82 was not raised in representations or considered during the examination of the extant Local Development Plan 2017 (CDXX).

The Environment Report (CD XX) which supports the Proposed Local Development Plan included a Strategic Environmental Assessment of OP82. Due consideration was given but not limited to its location within the Old Aberdeen Conservation Area, proximity to St Machar's Cathedral, the biodiversity, flora and fauna contained within the site. Any future development proposal will need to be considerate of the site's context and conform with the Proposed Local Development Plan's policies and associated supporting planning guidance to ensure such important aspects are not negatively impacted upon.

OP83 - Urquhart Building, City Hospital

882: Support for the allocation is noted.

OP84 - Resource Centre, City Hospital

882: Support for the allocation is noted.

OP85 - King Street/Beach Esplanade

1146: The wording in the Other Factors column of Appendix 2 for OP85 has been carried forward from the extant Local Development Plan 2017 (CDXX). This in turn was rolled forward from the previous Local Development Plan 2012 (CDXX). It is considered that there is no need to change the wording as per the suggested modification as the text as currently drafted allows the Council the comfort that the Urban Green Space designation will be protected should proposals for the site not take place. The respondent's longstanding commitment to the delivery of the project is noted.

OP87 - Pittodrie Park

The site is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried forward to the Proposed Local Development Plan.

258: There are a suite of policies set out in the Proposed Local Development Plan which consider the components which have caused the respondent concern. Any future proposed scheme would be assessed against policies such as Proposed Policy D1 – Quality Placemaking, Proposed Policy D2 – Amenity and Proposed Policy D3 – Big Buildings. Such a policy framework gives ample scope to consider and protect the surrounding existing residential amenity should the site be developed in the future.

944: Support for the allocation is noted.

118: The respondent's concerns relating to the provision of affordable housing are noted. As stated previously with regard provision of affordable housing, any future development proposal which comes forward will be required to meet obligations towards affordable housing in line with the Proposed Local Development Plan's Policy H5 – Affordable Housing and the requirements of Scottish Planning Policy (CDXX). In response to the detailed research undertaken by the respondent in terms of the perceived high number of homes for sale in the area around Pittodrie, the housing land allocations contained within the Proposed Local Development Plan are in line with the requirements of Table 3 of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX). The allowances set out in Table 3 were informed by the Housing Need and Demand Assessment 2017 (CD XX) which considers the need across the City Region for new homes. While there may be changes in demand for homes in the market currently the approach the Proposed Local Development Plan is evidence based and in line with the requirements of paragraphs 115, 116 and 117 of Scottish Planning Policy (CD XX). Concerns relating to negative equity are therefore outwith the considerations of a Local Development Plan.

OP89 - Kaimhill Outdoor Centre

31, 129: While the respondents concerns are noted, they are unfounded as Appendix 2 of Proposed Local Development Plan states that "*Play park area should be retained and compensatory recreational provision made in the local community*" in order to mitigate the loss of green space through the development of OP89.

With regard the site being better used as a community garden, there is a Council owned allotment at Pitmedden Crescent in close proximity to OP89. The Council's food growing strategy – Granite City Growing (CD XX) is responsible for the improvement of community food growing spaces. With regard to the need for additional housing allocations, as stated above the Proposed Local Development Plan's housing allocations are in line with the requirements of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX).

31: There are a suite of policies set out in the Proposed Local Development Plan which consider the components which have caused the respondent concern. Any future proposed scheme would be assessed against policies such as Proposed Policy D1 – Quality Placemaking, Proposed Policy D2 – Amenity and Proposed Policy D3 – Big Buildings. Such a policy framework gives ample scope to consider and protect the surrounding existing residential amenity should the site be developed in the future.

OP84 - Resource Centre, City Hospital

59: The respondents concern is noted. However, rabbits are not a protected species so it is unlikely that there is a mechanism to ensure the colony is relocated should OP84 be developed.

OP93 – Former Summerhill Academy

The site is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried forward to the Proposed Local Development Plan.

123: The respondent's concerns relating to the development at OP93 are noted. The Council consider that there may be confusion on the respondent's part that OP93 is a

different site to Former Summerhill Academy and would therefore result in additional allocations in the immediate area. Delivery of this allocation is already under way and was granted under planning permission (DPP160477) subject to conditions in October 2017 (CDXX). The issues raised by the respondent in relation to education and healthcare provision and traffic generation were considered and addressed through the planning application process.

672: A Construction Management Plan formed part of the Conditions for planning permission DPP160477 (CD XX) for 369 homes at OP93. Any issues regarding compliance with the Construction Management Plan would be a matter for the Council's Development Management and Planning Enforcement Teams.

1101: Content of the submission is noted. The Delivery Programme (CDXX) can be amended to reflect this.

OP95 - Station Gateway: City Centre Masterplan Intervention Area

843: The allocation of OP95 Station Gateway has been included in the Proposed Local Development Plan in order to enable the delivery of the Vision of the Aberdeen City Centre Masterplan and Delivery Programme (CD XX). Page 62 of the Aberdeen City Centre Masterplan and Delivery Programme (CD XX) states the focus of the Station Gateway regeneration is "*The critical remodelling of the key gateway to the city centre, with new business and commercial developments, providing city centre users and visitors with a radically transformed arrival experience, leading seamlessly northwards to Union Street*". The development objectives set out on page 82 of the Aberdeen City Centre Masterplan and Delivery Programme (CD XX) state "*Removal of cars on Guild Street and sections of Carmelite Street and Wapping Street, creating the opportunity to expand pedestrian footways and Union Square as a pedestrian friendly space and form a seamless pedestrian route through the Merchant Quarter.*" This would be complemented with "*Provision of a cycle hub on Guild Street to service the wider area*". A city centre bike hire scheme has just been announced (CDXX) which indicates Council's ongoing commitment to the delivery of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX). It is clear from the above that the Proposed Local Development Plan is enabling the delivery of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) and that both documents would align with the views set out in the respondent's submission.

855: Throughout the Proposed Local Development Plan there are textual references to the Aberdeen City Centre Masterplan and Delivery Programme (CD XX). A number of Opportunity Sites have been included in the Proposed Local Development Plan in order to support the delivery of intervention and regeneration areas. Reference is also made on page 16 of the Proposed Local Development Plan to the documents that influence its production and the City Centre Masterplan and Delivery Programme (CDXX) is included. It is considered there are sufficient references, allocations and policies in the Proposed Local Development Plan to align it with the Aberdeen City Centre Masterplan and Delivery Programme (CDXX).

OP96 - Castlegate and Castlehill: City Centre Masterplan Intervention Area

46: The reference to OP96 – Castlegate and Castlehill in Appendix 2 of the Proposed Local Development Plan is explicit in terms of the ground floor uses encouraged

“Refurbishment of properties on Castlegate and Justice Street. Appropriate ground floor uses include use class 1 (retail); Use class 3 (Food and Drink); and use class 11 (Assembly and Leisure).” Such uses would align with the respondent’s submission.

95: The City Centre Masterplan undertook detailed studies of intervention areas and potential uses in these areas. Page 86 of the Aberdeen City Centre Masterplan and Delivery Programme (CD XX) refers to land behind the Citadel as suitable for residential development.

770: Page 86 of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) states the Development Objectives for OP96 are *“An enhanced paving surface on Castlegate and Justice Street that reinforces and simplifies the space, taking a lead from the existing built edges to reacquaint the street threshold with surrounding facades and a rich design narrative accommodated within paving detailing, public art and street furniture”*. Any future development proposals would need to consider the objectives of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) and also the relevant Local Development Plan policies and building standards to ensure meeting the required access standards.

OP98 - VSA Gallowgate

The site is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried forward to the Proposed Local Development Plan.

582: Any future development will need to give due consideration to the site’s location within an established Conservation Area and the presence of a listed building adjacent to OP98. These elements are specifically noted in the Proposed Local Development Plan as are a suite of policies which would offer a framework for decision making in such a context.

OP99 - Old Torry

The site is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried forward to the Proposed Local Development Plan.

50: The Proposed Local Development Plan designates OP99 as mixed use. It also makes specific reference to the Old Torry Planning Study (CDXX) which offers greater context of what future mix and scale of development would be suitable across the allocation.

175: The representation is wide ranging. With regard to the development of wind turbines this matter is covered in paragraph 8.15 of the Proposed Local Development Plan. A Spatial Framework for Wind (CDXX) has been prepared which considers where such proposals could be acceptable in principle. The framework excludes the area of Torry.

Development planning policies and the allocation of sites for future development this is within the scope of a Local Development Plan. The general upkeep or tidiness of an area or community is beyond the scope of a Local Development Plan.

There is established development in the area of Old Torry and wider across Torry. Cities by their nature are in a constant state of change and redevelopment. The allocation of OP99 has been carried forward from the extant Local Development Plan 2017 (CD XX) and from OP129 in the Local Development Plan 2012 (CD XX). The principle of development at this site is well established and supported by the Old Torry Planning Study

(CD XX). The future of the Marine Lab, assumed Marine Scotland, is addressed against representation 608. All documentation relating to Local Development Plans and the supporting Supplementary Guidance or emerging Aberdeen Planning Guidance is published on the Council's website.

499: While there may be merit in creating an urban wildlife garden the principle of development at OP99 is well established through numerous Local Development Plans. Any development will require the inclusion of open space, and this may take the form of an Urban Garden if linked to the Council's food growing strategy – Granite City Growing (CDXX).

608: The respondent's submission is noted. The retention and/or redevelopment of the respondent's site is their prerogative.

626: While the allocation of OP99 is to an extent informed by the Old Torry Planning Study (CD XX) dependent on the scale of any future development would dictate the requirements for open space. It should be noted that the section of land the respondent refers to is within Council ownership and as such could be brought forward for other uses which could incorporate housing or open space components.

763: Any future development proposal would need to consider the residential amenity of the existing surrounding area. There is a suite of design focused policies within the Proposed Local Development Plan which would ensure due consideration is given to this. The Strategic Environmental Assessment (CD XX) which supports the Proposed Local Development Plan specifically refers to the assessment of flora and fauna at OP99. The Strategic Environmental Assessment (CDXX) states *"Ecological surveys will be necessary for this site, including any required mitigation measures relative to the proposals"*.

1123: As discussed above there may be merit in the use of OP99 as green space and the Council acknowledges the benefits that areas of green space have on physical and mental health. The principle of a mix of development types at OP99 is well established through previous Local Development Plans – such as the extant Local Development Plan 2017 (CDXX) and the Local Development Plan 2012 (CDXX). Any development will require the inclusion of open space and this may take the form of an Urban Garden if linked to the Council's food growing strategy – Granite City Growing (CDXX).

OP100 - North Dee: City Centre Masterplan Intervention Area

52: The allocation of OP100 North Dee covers an area of already developed land which would not result in the loss of amenity space given none exists within the site boundary. The intention of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) at North Dee City Centre is to create a better link between the site and the River Dee waterfront thereby creating more amenity for the immediate and wider area. Page 31 of the Aberdeen City Centre Masterplan and Delivery Programme (CD XX) in relation to OP100 states *"This project entails the full redevelopment of this area to create a highly desirable central business district set within a network of attractive streets and open spaces, along with other complementary uses (e.g. retail and leisure), which make for a desirable urban business district"*.

80: It is unknown how long a development will take to commence or to complete. However, it is within the remit of the Council to address such concerns by placing a condition on a possible planning permission for a Construction Management Plan.

1120: Support for the allocation is noted. While there has been a recent decline in the take up of commercial and office units this does not warrant the amendment of the Proposed Local Development Plan's policy context for the site. The proposed uses for the site align with the wider set of uses for the surrounding existing area and the Vision of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX). To alter such uses at this point would be to undermine the long-term strategy for the regeneration of the City Centre.

OP102 - George Street / Crooked Lane

The site is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried forward to the Proposed Local Development Plan.

877: The respondent's submission is noted. The site context and access and egress of adjacent and adjoining sites would be given due consideration if a future development proposal were submitted.

OP106 - Torry Waterfront: City Centre Masterplan Intervention Area

23: An objective of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) for OP106 Torry Waterfront is the opening up of the waterfront. Page 39 of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) sets out Project CM03 which envisages *"Torry Waterfront: A new riverside housing development on the south bank of the River Dee at Torry facilitated by the relocation of existing industrial uses. The development would expand and complement the existing community of Torry, providing new housing, enhanced access to the city centre through a new pedestrian bridge, a much-improved riverside park and promenade and new retail and leisure uses."* Such projects would in fact align with the wishes of the respondent's submission.

88: The respondent's submission is noted. The site context and access and egress of adjacent and adjoining sites would be given due consideration if a future development proposal were submitted.

OP116 - Froghall Terrace

The site is allocated in the extant Local Development Plan 2017 (CDXX) and has been carried forward to the Proposed Local Development Plan.

1018: The subject site has been cleared and is allocated for residential development in the Proposed Local Development Plan. Any future development proposal would need to be supported by a traffic assessment to consider the potential traffic impacts and potential mitigation of these impacts. Likewise, any future proposal would need to meet the parking requirements set out in the Proposed Local Development Plan.

Reporter's conclusions:

Reporter's recommendations:

Issue 16	CITY CENTRE GENERAL; ALTERNATIVE SITES: CITY CENTRE AND URBAN	
Development plan reference:	No reference in Plan	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Sarah Myers (111), James McKay (157) Rubislaw Estates (189) Adam Gray (245) Telereal Trillium (741) Arnold Clark Automobile Ltd (742) Old Aberdeen Heritage Society (836) Castlehill and Pittodrie Community Council (843) Maíra Colombrini (912) Union Square Developments Ltd (Hammerson plc). (913) Queens Cross / Harlaw Community Council (932) Aberdeen Football Club Plc (944) Robert Hamilton (971) Jupiter Seafield (1075) Pippa Robertson (1110) Colin Fraser (1180)</p>		
Provision of the development plan to which the issue relates:	<INSERT TEXT>Alternative Sites in the City Centre	
Planning authority's summary of the representation(s):		
<p><u>Kittybrewster Depot</u></p> <p>111: The respondent states that the current zoning of residential at the site of the Royal Mail Kittybrewster Depot is not appropriate. Given the hours of operation of the depot and the noise generated through operation a mixed-use zoning would be more appropriate.</p> <p><u>Affordable Housing Waiver</u></p> <p>157: The respondent considers the decision to make developers exempt from building affordable housing immoral.</p> <p><u>Bid Site B0304 - Land at Woodend Hospital</u></p> <p>189: The respondent sets out reasons as to why land at B0304 Land at Woodend Hospital should be allocated as a care home. The respondent notes that the site scores a maximum of 3 against all but four of the assessment criteria, with a total score of 55, on a par with other allocated sites.</p>		

The respondent refers to paragraph 9.32 of the Proposed Local Development Plan and to the Development Options Assessment Report's conclusion that this would "fit well within the surrounding area and provide a positive facility".

In response to the reasons the site was not considered desirable, the respondent accepts that the site forms part of the Den of Maidencraig Local Nature Conservation Site (CDXX) and North Burn of Rubislaw Green Space Network but asserts that the site is of limited ecological value and that the species using it as habitat are commonly found. The respondent goes on to assert that the site does therefore not make any special contribution to nature conservation or the Green Space Network. Development of the site could enhance its ecological value through planting and landscaping.

The respondent contends the slope/access assessment of the site and considers it is possible to develop the site.

With regard criteria for which the site scored less than three in the Development Options Assessment Report the respondent responds:

Landscape features will not be impacted upon as they are not readily visible from outside the site and landscaping and replacement planting would enhance the site thus providing a wildlife corridor.

There has been a double assessment in terms of constrains with regard the Green Space Network and the site gradient.

The respondent compares the subject site to two other sites which were classed as desirable OP36 and B0319 Woodend Hospital. OP36 was previously accepted by the Council given it was land zoned as Urban Green Space and Green Space Network, it had steep slopes and there were records of bats present.

Bid reference B0319 Woodend Hospital was assessed as preferred while scoring 53 in total. The nature conservation criteria were scored as 2 compared with 1 for B0304 but with the same constraints identified in terms of it being part of the Local Nature Conservation Site and Green Space Network.

The respondent asserts that B0304 is more favourable in terms of landscape features than B0319.

Union Terrace Gardens

245: Redevelopment of Union Terrace Gardens has taken too long and has been a missed opportunity. The City Centre is in need of rejuvenation and reinvestment. Development of shopping centres has destroyed the high street.

54 Gallowgate, Greyfriars House

741: Support for the mixed use/ Policy H2 designation across the location of 54 Gallowgate. Recognise that Policy H2 entertains new residential development subject to amenity considerations.

Note that Policy H3 required a higher density for residential in city centre windfall sites. These policy elements are supported by the respondent and proved through Aberdeen

City Council approving planning permission in principle (application reference 200246/PPP) in July 2020. Generally, support the Proposed Local Development Plan but would appreciate further dialogue on Opportunity Site recognition in Appendix 2 and the Proposals Map.

Arnold Clark Accident Repair Centre 54 Menzies Road (Sits within OP106)

742: The respondent sets out that Arnold Clark have a significant presence in Aberdeen. It is considered the site at 54 Menzies Road (approximately 1 acre) is a viable and deliverable brownfield redevelopment site. The site is transitional between industrial and residential properties on Menzies Road. It is mentioned that the area to north is linked to 200634/PAN. The site is no longer required as the repair centre is to be relocated and showroom too small and not used. The respondent asserts that the site has good potential to create a high-quality residential environment, either as a wider Masterplan site or a standalone development. The respondent supports the sites inclusion within H2 mixed use areas, which provides policy support of the redevelopment on the site.

The site has potential to accommodate a high quality residential development which reflects the existing uses and enhances the character of the area and could be included within the overall OP106 allocation. It would then offer a buffer between the different uses. The respondent considers that if the Torry Waterfront Masterplan were developed early in the Plan period it would allow site to come forward in a way which compliments the changing character. Such a site would be progressed over the short to medium term and could complement the City Centre Masterplan and the Council's affordable housing programmes.

Rezoning from Mixed Use to Residential

836: Land is located within area of land bounded by Jute Street, Froghall Terrace and Kings Crescent. Land is triangular in shape, bounded on all sides by main roads and is exclusively housing with no mixed uses. The respondent requests that the area of land to be rezoned from mixed use to residential (H1). The area would join onto other areas already zoned as residential.

King Street

843: To improve the City Centre, the route into and out of the City Centre also need to be considered, such as King Street and its surrounding side streets. Comments note consideration should be given to safe access for pedestrians and cyclists, regeneration of the built environment, maintenance of building frontages, infrastructure investment (paving and lighting) to promote safe access, increase footfall and ensure vibrancy.

Bon Accord Terrace Gardens

912: Bon Accord Terrace Gardens are not maintained to same level as other public spaces. Lighting, littering is an issue and concern raised about activities that take place there.

Concerns over maintenance and security of Bon Accord Terrace Gardens and these worsening through Development Plan proposals. Notes that the gardens could be transformed into a tourist location and great public space. They need care and transformation.

912: Proposed Local Development Plan is vague on details regarding pedestrianisation and level of impact assessments made or alternatives promoted to address impact on traffic. Long term changes could negatively impact the population if not properly assessed and alternatives put in place.

City Centre Retail Core – VC4

913: The respondent agrees for a reduction in the area of Retail Core shown on the Proposals Map to Bridge Street and Broad Street and the existing shopping centres at either side of the north - south axis. It is also recommended that Bridge Street/ Union Terrace to Bon Accord Street/ Union Wynd be rezoned to mixed use.

West End Area – VC6

932: The respondent considers the West End Area should be rezoned to residential.

OP87 - Pittodrie Park

944: Redevelopment of the site is critical to funding of the stadium and associated works as approved under application 170021/DPP. Due to change market post COVID-19, site should be considered as a mixed use development.

OP82 - Dunbar Halls of Residence, Don Street

971: Comments on site suitability - see Issue 15. Alternative zoning proposed.

Hill of Rubislaw Business Park

1075: The respondent requests the site be rezoned from B2: Business Zones to H2: Mixed Use. As a result the site should be identified as an Opportunity Proposal for Mixed Use development.

A rezoning to H2: Mixed Use better supports the current economic climate. There would be no conflict with surrounding residential land uses. The majority of the site is in single ownership. There are good transport links. Current market for office development is limited, there is significant Grade A office accommodation in the City. The recently refurbished office blocks are likely to remain vacant. A mixed use zoning will allow for greater flexibility, diversification and be pro active in attracting investors to the City. The rezoning would ensure good placemaking and comply with Scottish Planning Policy by ensuring a flexible approach is taken to ensure changing circumstances can be accommodated and new economic opportunities realised. The rezoning will have little impact on the available employment land as shown in the Employment Land Audit 2019 notes 210 hectares of marketable land is available. Aberdeen City Council have accepted that alternative uses are appropriate on existing business land via the reallocation of Cloverhill and Silverburn House. The proposal complies with the Aberdeen City and Shire Strategic Development Plan 2020.

Bid Site B1101 - Garthdee Road

1110: The respondent supports the decision to remove the site from the Proposed Local Development Plan and for it to be retained as Green Belt. The site, as well as others that may be suitable, should be allocated as a food growing opportunity.

Bid Site B0406 - Manor Park

1180: The respondent notes proximity to Haudagain Development zoned for commercial, retail and housing and requests site be zoned as 'mixed use'. The respondent queries where site appears in Development Option Assessment Report.

Modifications sought by those submitting representations:

Kittybrewster Depot

111: Rezone the Royal Mail Kittybrewster Depot from residential to mixed-use

Affordable Housing Waiver

157: Affordable housing requirement to be reinstated immediately.

189: Allocate for B0304 Land at Woodend Hospital as a residential care home development in the Proposed Local Development Plan.

Site at 54 Gallowgate, Greyfriars House

741: Generally support the Proposed Local Development Plan but would appreciate further dialogue on Opportunity Site recognition in Appendix 2 and the Proposals Map.

Menzies Road

742: Sites at Menzies Road should be specifically identified as a brownfield regeneration opportunity.

Jute Street

836: Rezone triangular area of land between Jute Street, Froghall Terrace and Kings Crescent as residential.

City Centre and Retail Core

913: Modify Proposal Map as follows:

Retail Core should comprise Union Street (Bridge Street to Broad Street) and the existing Shopping Centres at either side of the north-south axis.

Remove the current portion from Bridge Street/Union Terrace to Bon-Accord Street/Union Wynd, which should be incorporated within the wider 'Mixed Use Area' designation

West End Area – VC6

932: Rezone the areas to residential.

OP87 - Pittodrie Park

944: Identify OP87 Pittodrie Park as Mixed use.

OP82 - Dunbar Halls of Residence, Don Street

971: Amend site allocation from residential to educational use as replacement for St Peter's School.

Rubislaw Business Park

1075: Rezone Hill of Rubislaw Business Park as an Opportunity Site for mixed use.

Summary of responses (including reasons) by planning authority:

Kittybrewster Depot

111: The Royal Mail Kittybrewster Depot has been operating directly adjacent to a large number of residential properties for a number of years and the Council is unaware of any amenity issues. It is an established use which is considered compatible with the surrounding area. As such there is no need for a rezoning of the site.

Affordable Housing Waiver

157: This matter is outwith the Examination of the Proposed Local Development Plan but for context it should be noted that there was a Waiver in place between 20 September 2018 and 31 December 2020 on contributions towards affordable housing within the City Centre. A main strand of the City Centre Masterplan (CDXX) is to increase City Centre living, however there were only 56 homes completed in the City Centre between 2013 and 2018 and a Report was commissioned which found that financial viability was the cause of the issue (CDXX). The Report suggested a waiver on affordable housing contributions, and it was decided to pursue this scheme as a pilot.

Bid Site B0304 - Land at Woodend Hospital

189: Each Bid Site was assessed upon its own merits. While it is noted that this Bid Site scored highly on a number of criteria in the Development Options Assessment Report (CDXX), it scored poorly in others. It is also noted that the Assessment found that a care home would have provided a positive facility for elderly people which fits in with the area however the effects upon local natural conservation would not balance when assessed against the potential benefits, and there are more appropriate sites for such a development. Of particular concern is the fragmentation of the green network which would significantly obstruct wildlife traveling along the North Burn of Rubislaw which acts as a corridor for nature. The site includes a number of mature trees, of which several include Tree Preservation Orders and the loss of which could not be easily mitigated. The mature trees also provide a natural backdrop for the houses at nearby Denwood which it would be desirable to maintain. While there may be a technical solution to providing a vehicular access into the site, this would require significant ground works which would have implications in terms of visual appearance of any prospective development.

Union Terrace Gardens

245: Permission 170497/DPP (CD XX) was granted for the redevelopment of Union Terrace Gardens and construction work is underway. The programme has a provisional

completion date of Winter 2021, with landscaping potentially completing in 2022. The time lost from the closure of the site due to the first lockdown in Spring 2020 means seasonal planting originally scheduled for 2021 will have to wait until 2022 when the planting season resumes. Planting during the winter is not feasible. With regards to comments in relation to shopping centres, the Council undertook a Retail Study in order to ascertain capacity within the economy for additional retail floorspace. Any future planning applications will be considered against this study.

54 Gallowgate, Greyfriars House

741: Support for Proposed Policies H2 and H3 is noted and welcome.

Arnold Clark Accident Repair Centre 54 Menzies Road (Sits within OP106)

742: Support for the mixed use allocation of OP106 is noted and welcome. Residential development is not precluded on the basis of any site within OP106 not being vacant or derelict. The Proposed Local Development Plan outlines a definition of brownfield within the Glossary (page 102) as including “...*vacant or derelict land; land occupied by redundant or unused buildings*”. The site is not included within the Brownfield Urban Capacity Study 2020 (CDXX) however if the landowner considers the site to be redundant then this document is kept under review and can be revised at a later date.

Rezoning from Mixed Use to Residential

836: The area was designated for mixed use in the extant Local Development Plan 2017 and this designation is therefore established. The zoning of the area as mixed use acknowledges the sites close proximity to the City Centre, arterial routes and public transport connections. As such there is a need for a wider range of uses than residential only in this area to serve the needs of both local residents and the wider area.

King Street

843: There are provisions within the Proposed Local Development Plan to preserve the integrity of the appearance of streetscapes, specifically Proposed Policy D9 – Shopfronts which seeks shopfront designs to be sensitive to building and positive to street scene and Proposed Policy D1 – Quality Placemaking which seeks development to include quality architecture, craftsmanship and materials. Any aspirations for the regeneration of King Street and its side streets is not a matter to be addressed directly by the Local Development Plan. The Aberdeen City Centre Masterplan and Delivery Programme sets out the Vision for streetscape works on King Street adjacent to the Castlegate. The Regional and Local Transport Strategies are documents better suited to considering interventions to improve the layout of King Street (CDXX and CDXX).

Bon Accord Terrace Gardens

912: The maintenance and security of Bon Accord Terrace Gardens are not issues to be specifically addressed by the Local Development Plan. This includes the issue of littering. Any aspirations for the regeneration of Bon Accord Terrace Gardens are not a matter to be addressed directly by the Local Development Plan but could be considered through other strategies developed by the Council to specifically consider such issues.

912: Certain allocated sites within the Proposed Local Development Plan set out the requirement for pedestrian links, while Proposed Policy D1 – Quality Placemaking sets out the requirement for new development to be designed with pedestrian movement as a priority which is in line with national guidance Designing Streets. Any proposals to pedestrianize existing roads which are currently used for vehicular traffic is a matter for the Council's Roads Project Team rather than being an issue to be addressed directly by the Local Development Plan.

City Centre Retail Core – VC4

913: Please refer to response under Issue 32 – Policies VC1, VC2, VC3, VC4, VC5 and VC6 Vibrant City.

West End Area – VC6

932: Please refer to response under Issue 32 – Policies VC1, VC2, VC3, VC4, VC5 and VC6 Vibrant City.

OP87 Pittodrie Park

944: OP87 Pittodrie Park is allocated in the extant Local Development Plan 2017 and has been carried forward to the Proposed Local Development Plan. No development bids were received before the publication of the Proposed Local Development Plan and it is considered unnecessary and inappropriate to change the site's zoning from residential to mixed use at this late stage in the process.

OP82 - Dunbar Halls of Residence, Don Street

971: If a proposal were to come forward for an education use at the site, this would be considered compatible in principle with the current policy zoning. In the absence of any proposal the current zoning remains appropriate and no rezoning is required. Please refer to response under Issue 15: Allocated Sites: City Centre and Urban for further discussion on OP82.

Hill of Rubislaw Business Park

1075: The site is designated as Specialist Employment Land in the extant and Proposed Local Development Plans. It makes a meaningful contribution to the City's land supply for employment land and therefore supports economic growth. While there may have been disruption to the commercial rental market and a reduction in the recent need for office space over recent years it is not considered that this will be a long term trend and it would be premature to rezone such a site. The site is well connected to existing transportation routes and accessible from surrounding residential development. While the respondent refers to Cloverhill being rezoned to residential, Cloverhill had never been developed and remains unused. Hill of Rubislaw is an established employment site and as such the site is suitable for Class 4 and should be retained. It should be noted that Proposed Policy B2 allows for facilities that directly support business uses where they enhance the attraction and sustainability of the Business Zone for investment.

Bid Site B1101 - Garthdee Road

1110: Support for the non-allocation of Bid Site B1101 is noted and welcome.

Bid Site B0406 - Manor Park

1180: The assessment of B0406 Manor Park is on page 305 of the Development Option Assessment Report (CDXX). The current residential zoning allows, in principle, development of residential uses or other uses if they are considered complementary to residential use and subject to other policy considerations. The site is immediately adjacent to land proposed for significant regeneration and a roads intervention project which once complete may impact on the viability of the site for uses other than residential or uses serving a local catchment. There is no justified reason to rezone from its current residential land zoning when current policy provision would, in principle, already allow uses complementary to residential use.

Reporter's conclusions:

Reporter's recommendations:

Issue 17	ALLOCATED SITE OP56 AND OP61: ENERGY TRANSITION ZONE, AND OP62: BAY OF NIGG, OP64: FORMER NESS TIP	
Development plan reference:	City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p> Sandra Low (22) Natalie Brown (24) Suzanne Taylor (25) Walter Innes (26) Leigh Osbourne (27) Kirsten Knight (28) Ms Mikaela Taylor (30) Lorraine Garden (47) Sylvia Walker (48) Rachel McBain (50) Graham Davis (57) Paula Finney (64) David Knight (68) Sarah Young (69) Ronald Plushkis (70) Steven Bedford (72) Irene Lynch (76) Paula Leisk (77) Duncan McNeill (78) Stacey Beagley (81) Mike Maas-Lowit (82) Moirra Low (84) Renee Slater (85) Ms Julie Raeburn (87) Hillary Kerr (91) Ms Heather Macpherson (93) Graham Corbett (97) Benjamin Penman (98) Angie Christie (99) Liz Howarth (100) Debbie Greig (102) Shona Johnstone (104) Brimmond Court Tenants Association (105) Penny Linemann (119) Bridge of Don Community Council (137) Suzanne Kelly (150) Christine Bennett (151) Christopher Davies (152) Allan Kerr (153) Julie Poole (161) Sheila Tough (162) Karla Mathieson (163) </p>		

Donna Styles (164)
Jacqueline Harvey (165)
Allan Milne (178)
Lindsay Rose (179)
Edurne Elguezabal (181)
Shona Cramond (182)
Emma Stewart (183)
Linn Falt (184)
Graham Vincent (185)
Karen Steele (186)
Susan Barber (187)
Rachel Hamilton (194)
Anke-Mass Lowit (195)
Amanda Craig (197)
Terry Duthart (198)
Angela Harkins (199)
Moirra Low (200)
Ian Bell (201)
Brett Aitken (202)
Rosslyn Nicholson (203)
William Henderson (205)
Liam Bell (207)
Mr Iain Davidson (208)
Robert Murray (209)
Paul Taylor (210)
Lewis Robertson (211)
Gary Fraser (212)
Richard Morrison (213)
Ross MacBeath (215)
Amy Leung (216)
Andy Haines (217)
Mike Garden (219)
George Clark (220)
Miss Stacy Kerr (221)
Louise Williamson (222)
Susan Clark (223)
Nicola Homes (225)
Annette Grieve (228)
Hugh Smith (229)
Eseorhe Igbelokotor (231)
D Russell (237)
Pat Stanley (238)
Caitlin Singer (239)
Helen McCombie (255)
Marie Milton (256)
Meadhbh Moriarty (257)
Stuart Auld (261)
Sarah Rae (262)
Rachael Junor (352)
Suzy Reid (353)
Douglas Crichton (359)
Sandra Paterson (362)

Anton Kossmann (427)
Helen Davidson (429)
Betty Lyon (432)
Elizabeth Stanyer (495)
Trudie Leask (499)
Andrew JI Dalziel (509)
Susan Robertson (533)
Alan Young (536)
David Hunter (537)
Marlene Ligertwood (538)
William Loxton (539)
Jacqueline Loxton (554)
Tamar Weatherly (626)
Marlene Mcelhatton (643)
Bruce Calrk (665)
Alison Thomson (667)
Gordon Bathgate (695)
Annie Wood (699)
Linda Allan (702)
Gordon Kerr (705)
Nichola Still (708)
Dr Ishbel Shand (726)
Scottish Water (729)
Diane Sandison (751)
Torry Community Group (763)
Kath Hancock (779)
Ms Colleen Anderson (787)
Ms Renee Slater (791)
Jill Lepre (796)
Frances Sinclair (797)
Lyndsey Thompson (798)
Dr Donna MacCallum (799)
Jenni McAleese (800)
Kelly White (801)
Chris Paterson (802)
Pauline Reid (803)
Phyllis McLachlan (804)
Stuart Law (805)
Lynne Mennie (806)
Dr Susan Smith (807)
Kieran Masson (809)
Linda Smith (818)
Allison Summers (819)
Sally-Ann Chadha (822)
Marlene Somers (825)
Colin Hird (828)
Kate Anderson (831)
Tamsin Law (835)
Castlehill and Pittodrie Community Council (843)
Derek Masson (845)
Michelle Masson (847)
Amanda Maclellan, Rob Sim, Iona Sim and Fraser Sim (849)

Kim Walker (851)
Cove and Altens Community Council (854)
Christine Arnold-Soloman (856)
Catherine Cowie (860)
Karrie Neish (876)
Raymond Clark (878)
Dorothy McKenzie (879)
Linda Low (884)
Opportunity North East (887)
NatureScot (888)
Scottish Environment Protection Agency (892)
Maureen Finlayson (898)
Aberdeen Harbour Board (910)
R and H Leith (921)
Lorna Scott (922)
Colin McFadyen (924)
Aberdeen and Grampian Chamber of Commerce (925)
Sarah Fenn (928)
Jenna McGowan (929)
Paul Stuart Massie (931)
William Ross (935)
Joan Thomas (943)
John Melville (945)
Linda Sim (957)
Mark Bremner (962)
David Stuart (965)
Lorraine Fraser (968)
Julie Sutherland (969)
Mathew Wood (970)
Susan Dempster (972)
Danielle Buchan (975)
Clare Leiper (977)
Lynne Ritchie (978)
Liz McLeman (979)
Ian Baird (980)
Shona Greig (981)
Annette Duncan (984)
Save Doonies Farm (985)
Evelyn Murray (1008)
Jennifer Reid (1010)
Bruce and Gillin Purdon (1017)
John Webb (1020)
James Stanyer (1032)
Lesley-Anne Mulholland (1056)
Ruth Howie (1057)
Mateusz Lagoda (1059)
Jason Maclean (1062)
Aberdeen and Aberdeenshire Greens (1088)
Louise McCafferty (1095)
Torry Heritage Group (1099)
Magdalena Kazus (1102)
Simon McLean (1105)

Richard Caie (1112)
 Ray Clark (1115)
 Catherine Cowie (1117)
 David Fryer (1123)
 Tamsin Morris (1132)
 Alison Stuart (1133)
 Gary Greig (1139)
 Andrew Wall (1142)
 Hugh Davies (1155)
 Bryce McGregor (1157)
 Jane Clark (1161)
 Daniel Verhamme (1169)
 Michael Duguid (1173)
 Jodie Stark (1174)
 Mark Fordyce (1176)
 Marie Buckley (1178)
 Robin White (1181)
 Christopher John Adie (1183)

Provision of the development plan to which the issue relates:

Opportunity Site for Energy Transition Zone

Planning authority's summary of the representation(s):

Support

843: Welcome the partnership approach between Governments, Local Authority and business bodies on the development of Energy Transition Zone spaces.

887: The respondent supports the allocation of OP56 and OP61.

887, 910: The respondents support the allocation of additional land to support the Energy Transition Zone, as indicated in Policies B4 and B5. The respondents also consider that the OP64 Ness Landfill represents a potential future development opportunity which could help support the growth of South Harbour and the Energy Transition Zone. The respondent states that the landfill is located in an area where available land to support the South Harbour is limited and constrained and as such it should not be lost to alternative uses. Further investigation should be done on the potential feasibility and deliverability of the site.

892: Respondent supports the concept of an Energy Transition Zone, but not at OP56 St Fittick's Park.

892: Respondent supports the proposed allocation of site OP62 Bay of Nigg (55 hectares) as an Energy Transition Zone which allocates land adjacent to the new harbour and existing rail line.

925: Support the Energy Transition Zone. Supports the Region's ambition to be a global leader in low carbon technologies and achieve net zero. Energy Transition Zone will support the drive to decarbonise, utilise existing skills sets and lead to further clean energy investment. The Energy Transition Zone supports the Regional Economic Strategy.

Object to Allocations of OP 56 and 61

70, 72, 93, 151, 152, 153, 219, 495, 499, 509, 544, 751, 779, 807, 854, 856, 878, 921, 928, 935, 945, 965, 980, 787, 1032, 1056, 1062, 1088, 1115, 1123, 1157, 1161, 1176: The respondents object to the development of OP56 an Energy Transition Zone.

162, 163, 164, 178, 179, 181, 184, 185, 186, 187, 195, 208, 231, 509, 536, 796, 798, 800, 801, 803, 804, 805, 806, 807, 809, 818, 819, 822, 825, 828, 845, 849, 851, 854, 860, 876, 879, 884, 921, 922, 928, 929, 935, 968, 1010, 1017, 1032, 1056, 1062, 1088, 1112, 1115, 1123, 1157, 1161, 1176, 1178, 1181, 1183: The respondents are opposed and object to the rezoning and development of OP61 Doonies Farm.

General Queries on the Energy Transition Zone

432: The respondent raises concerns regarding the development of OP56: St Fittick's Park.

643: The respondent queries; the amount of land required for development, whether cables would be buried, whether transition building/station would have an adverse impact on surrounding landscape. The respondent queries if after site completion the park would be returned and if the proposed wind turbine would be for industrial use only, or whether would it benefit surrounding residents.

Development Options Assessment

807, 854: The respondents make reference to the Development Options Assessment of Bid Sites; South Harbour Part 1 B1204, South Harbour Part 2 B1317 South Harbour Part 3 B1318 and South Harbour Part 4 B1319 and how they were considered as undesirable.

Energy Transition Zone should be Located on an Alternative Site

28, 30: The respondent, while understanding the Proposed Local Development Plan's aims to mitigate the impact of climate change, considers that locating an Energy Transition Zone at St Fittick's Park will be detrimental to the community of Torry given that it is an area which scores poorly in terms of multiple deprivation.

22, 25, 26, 27, 28, 30, 76, 85, 91, 98, 100, 102, 104, 105, 119, 153, 181, 182, 185, 197, 198, 199, 200, 203, 207, 209, 211, 213, 215, 217, 219, 220, 221, 222, 229, 239, 255, 256, 257, 352, 353, 359, 362, 432, 495, 509, 533, 544, 562, 699, 702, 705, 725, 791, 798, 799, 806, 807, 828, 831, 878, 892, 898, 921, 924, 928, 929, 943, 962, 972, 981, 1105, 1115, 1117, 1123, 1133, 1139, 1155, 1169, 1173, 1181: The respondents do not consider the proposed Energy Transition Zones sites appropriate for development or necessary. It is suggested it would be better to pursue alternative sites such a brownfield, vacant or derelict sites in existing industrial areas such as East Tullos or Altens. Developing at such locations would avoid the loss of Green Belt and green space land.

26: The respondent suggests the use of existing brownfield sites. The respondent considers that better use would be made of existing employment sites rather than developing over an area of green space. The respondent includes supporting

documentation to illustrate the numerous vacant sites (SDXX
<https://www.flickr.com/photos/25170963@N08/favorites>)

137: The respondent asserts that OP2 and its adjacent employment land allocations would be more suitable for an Energy Transition Zone with existing road connections already in place.

726, 791, 807, 1105, 1056: The respondents, in relation to both OP56 and OP61 set out that the Aberdeen City and Shire Strategic Development Plan 2020 does not require the allocation of any additional employment land. There are large employment areas with capacity available in North Aberdeen instead, as well as close to the harbour at Altens and East Tullos, which were originally identified as areas where industrial activity to support the harbour would take place. Respondents query the evidence that this particular site is necessary for an Energy Transition Zone and that there is market demand. Query use of public money and public sector involvement in this proposal.

980: The respondent refers to the Biggar Report (2013) and that when the Harbour Expansion was being considered existing industrial sites were discussed as supporting the development.

Supporting Evidence for an Energy Transition Zone

539: The respondent queries if feasibility studies and audits have been carried out regarding the suitability of renewable technology, and empty industrial areas.

878, 1115: Note that the Feasibility Study recognises that the creation of an Energy Transition Zone does not need to take over these areas. All the projects which comprise and Energy Transition Zone do not have to be together or located within close proximity to the new South Harbour.

726, 791, 1133: No evidence that locating development on this site would support energy transition. Limited activities that require to be located immediately adjacent the harbour.

99: The respondent considers that the concept of the Energy Transition Zone is not defined. There are other areas within the United Kingdom and Europe where this could take place. The impact of Brexit on the economy are yet to be fully realised. The physical area will require extensive groundworks to make it fit for purpose. Transport infrastructure, road links, needs to be identified in the Plan.

Loss of Green Belt

150, 152, 153, 229, 238, 702, 807, 856, 878, 1123: The respondents raise concerns that the development of OP56 and OP61 will result in the loss of Green Belt land.

Loss of Green Space/Open Space

28, 30: The respondent, while understanding the Proposed Local Development Plan's aims to mitigate the impact of climate change, considers that locating an Energy Transition Zone at St Fittick's Park will be detrimental to the community of Torry given that it is an area which scores poorly in terms of multiple deprivation.

24, 25, 26, 25, 28, 30, 47, 48, 50, 57, 64, 68, 69, 70, 72, 76, 77, 78, 81, 84, 85, 87, 91, 97, 98, 99, 102, 104, 105, 119, 137, 150, 151, 152, 153, 194, 197, 198, 199, 200, 203, 205, 207, 209, 210, 211, 213, 215, 216, 217, 219, 220, 221, 225, 237, 255, 257, 261, 353, 359, 362, 432, 495, 499, 509, 538, 539, 544, 625, 626, 665, 667, 695, 699, 705, 708, 763, 779, 807, 831, 849, 851, 854, 856, 878, 921, 928, 943, 957, 962, 970, 972, 975, 892, 980, 984, 945, 1032, 1057, 1059, 1088, 1095, 1099, 1102, 1105, 1112, 1115, 1123, 1173, 1176:

The respondents are concerned that development of OP56 and OP61 will result in a loss of the remainder of the limited green space which is much used and valued by the local community. The respondents also set out how the sites offer educational, exercise and wellbeing opportunities. Respondents note that areas of green space have been lost previously to industrial development such as Aberdeen Harbour and that the green space has become an island surrounded by development. Many in the community do not have private gardens, however the park is accessible to a wide range of people including those with mobility limitations.

78, 219, 539, 807, 1095: The respondents state that public money and donations were used to create the green space at St Fittick's and the wetlands. This money will have been wasted if the site is developed.

843: The Energy Transition Zone can be achieved without negatively impacting on green spaces within the city. Further feasibility studies are required to explore locations of these sites.

888: The respondent considers that regardless of protection for the East Tullos Burn Project area, the allocation of OP56 will significantly impact the park as a valued green space and compound previous losses arising from the harbour expansion development in Bay of Nigg OP62.

1133: Development on the site will have a negative impact on the Green Space Network, Local Nature Reserve's, Site of Special Scientific Interest and biodiversity in the area.

1155: Objection on the grounds of loss of green space - land which was temporarily given to the harbour for the development is now proposed to be developed.

1169: Objects to loss of green space (SD XX attached a link to a petition on Torry Greenspace)

78, 82, 726, 791, 807, 856, 957, 1056, 1099, 1132, 1133, 1139, 1142, 1155, 1157, 1161, 1174: Removing green space is contrary to the wider context of the Proposed Local Development Plan's protection of the environment (reference is made to Policy NE2 and others) and open space strategy (which states the area needs improvement). Development of green space is contrary to climate fight and will mean loss of carbon sinks.

Cultural Heritage and the Historic Environment

24, 78, 91, 203, 427, 787, 807, 935, 1056, 1095: The respondents are concerned that St Fittick's church will be impacted by development. The Church dates back to 1100 AD and should not be lost as part of the development of OP56 and the Energy Transition Zone. It is noted the Bay of Nigg Development Framework notes the importance of St Fittick's Park. Development could result in the loss of cultural heritage.

Cumulative Impact of Heavy Industry

27, 47, 48, 68, 69, 72, 76, 82, 85, 97, 105, 151, 153, 181, 201, 359, 362, 499, 667, 699, 702, 726, 763, 791, 856, 935, 945, 957, 1095, 1123, 1139, 1155, 1174: The respondents set out that there has been extensive heavy industrial development in the vicinity of the community of Torry. Reference is made to existing industrial areas, the Scottish Water Wastewater Treatment Plant within OP56, the Energy from Waste facility at OP107 and the Aberdeen Harbour expansion. The respondents are concerned by the cumulative negative impact of such types of development and how they will impact on the community. The negative impacts of such developments, or bad neighbours, have been compounded by an accompanying loss of green space. It is considered that there has been sufficient heavy industrial development in a relatively small area, that no more can be accommodated and no more green space should be lost to industrial development.

Impact on Mental Health and Wellbeing of Community

50, 82, 87, 91, 98, 150, 151, 195, 198, 201, 202, 203, 207, 209, 211, 212, 213, 217, 219, 220, 221, 225, 229, 237, 239, 255, 257, 352, 353, 533, 537, 538, 539, 705, 763, 779, 878, 921, 928, 943, 957, 962, 1056, 1057, 1088, 1105, 1123, 1132, 1133, 1155, 1157: The respondents do not support the development of OP56 and OP61 for an Energy Transition Zone as they consider it will result in a detrimental impact on mental health and wellbeing. The respondents stress the positive benefits of access to green space, which offer recreational and exercise opportunities, has had during the course of the pandemic. Development would negatively impact on the community's mental health and wellbeing. Reference is also made to the high levels of deprivation in the community of Torry and how it should not lose what little community assets it has. It is suggested that the community should manage the site. Reference is made to the rezoning not aligning with the aims of the Council's Local Outcomes Improvement Plan.

68: The respondent sets out that studies have been undertaken highlighting the necessity for green spaces to aid the physical and mental wellbeing of residents. Protection of the green space for the community supports United Nations Sustainable Development Goals 3 and 14 by allowing the community to use the area to improve physical and mental health and 14 by protecting the biodiversity present in the restored wetland, community woodland and surrounding grassland.

533: The development of the Energy Transition Zone at St. Fitticks and Doonies contradicts the Proposed Local Development Plan statement on Health and Wellbeing.

665: Development will impact on children's education.

Impact on Natural Environment and Biodiversity

27, 28, 30, 57, 69, 76, 78, 81, 85, 91, 93, 97, 99, 102, 104, 105, 150, 153, 199, 201, 203, 212, 219, 221, 255, 353, 359, 432, 499, 533, 539, 665, 695, 705, 726, 751, 763, 779, 787, 791, 807, 921, 928, 935, 943, 980, 984, 1105, 1032, 1056, 1057, 1088, 1095, 1099, 1123, 1132, 1133, 1157, 1161, 1176: The respondents set out that they have concerns that the development of OP56 St Fittick's Park, in addition to the development of Aberdeen Harbour South, will result in the loss of and fragmentation of habitat through development of green space and the East Tullos Burn (Nature Reserve/Site of Special Scientific

Interest). This habitat loss will in turn have a negative impact on wildlife and biodiversity. It is considered that such development is contrary to the Proposed Local Development Plan's Green Belt, green space and natural environment policies. The sites ability to aid flood management as a sustainable urban drainage system and as a carbon sink are also referenced.

72: Respondent asserts that there will be legal issues when trying to develop a protected wetland.

102, 104, 105, 201, 763, 928, 1056, 1133: The respondent believes that the development of OP56 and OP61 will result in loss of habitat and impact negatively on wildlife as there are numerous rare and protected species which use the site. The respondents note it is the only freshwater reed and high-quality wet grassland found within the city boundary. These species and their habitat should be protected as it is not possible to create a similar habitat locally. Reference is made that the following zonings and designations are present within the site; Green Space Network, Local Nature Reserve's, and Site of Special Scientific Interest.

427, 495, 928, 1088, 1105, 1112, 1123, 1132, 1155, 1056: The respondents state that the area has only recently been enhanced for biodiversity and natural flood management. There has been significant public spend and investment to increase the biodiversity of the East Tullis Burn. Respondents assert that parties who were involved in enhancement have not been notified of the Proposed Local Development Plan.

726, 791: The respondents refer to consideration of environmental impacts and mitigation in relation to the Aberdeen Harbour Revision Order (SD XX).

856: The Environment Report should take consideration of the Energy Transition Zone's impact.

892: The respondent sets out the value of the East Tullis Burn Project and this re-created a natural watercourse and wetlands with wildflowers and trees. The respondent sets out in detail the benefits which include increased amenity for the green space area, addressing pollution and flooding and improved access. It is stated that the project used public funds.

980: The respondent considers that policies have been amended in the Proposed Local Development Plan to the detriment of the natural environment and that the development is contrary to Policy NE2.

Flooding

533, 539, 537, 763, 928, 1057, 1095, 1155: The respondents set out that St Fitticks Park is a sustainable urban drainage (SuDS) basin. Developing this area will increase the risk of flooding. It is asserted that the burn is heavily contaminated and would have to be cleaned prior to any development. The creation of a SuDS zone would create a safe solution to the chemical contamination of the burn. The SuDS zone has become a home for protected species. The respondents state that St Fittick's Park and the Coast Road are both prone to flooding making this an unsuitable area for development.

892: The respondent suggests that if a site is to be allocated here then the relevant assessments are carried out first and the East Tullis Burn and wetlands and associated

buffer strips and floodplain are excluded from the development site allocation. In addition to land required for recreational access and habitat connectivity.

Community Benefit

427, 537: Respondent raises concerns regarding the allocation of OP56 St Fittick's Park for development as an Energy Transition Zone. Respondent queries how this development will benefit the local community.

1056, 1088, 1095, 1155: Development will have a negative impact on community led projects. Reference is made to food growing spaces.

1105: Note that the development of the incinerator suggested cheaper heating would result for the area, but yet to see any plans about tackling fuel poverty.

1105: Concern about the impact on community led projects already in the vicinity of the park (e.g. Grey Hope Bay and St Fitticks Edible Garden), and community connections and opportunities generally. Community should have management of the site to use as they wish.

1155: The respondent refers to the feasibility report says that there will be jobs and training, but these promises are constantly made and never delivered as was the case with the harbour.

OP62 - Aberdeen Harbour South Project

195: The respondent makes reference that the Aberdeen Harbour South project is incomplete. The original contractor for its delivery is no longer in place.

220: The respondent objects to associated works / area of development at Aberdeen South Harbour.

432: Respondent seeks a detailed mitigation and compensation plan that was detailed within the Aberdeen Harbour Expansion Project (October 2016).

807: The respondent considers that the proposal is a breach of the Aberdeen Harbour Revision Order (AHRO).

856: Work should be stopped as there is currently no Community Council.

887: OP62 South Harbour allocation supported.

1056, 1059, 1105, 1133: Permission for Aberdeen South Harbour extension (P151742) includes a Condition requiring the reinstatement and restoration of temporary service areas once the harbour is complete. Reinstatement and restoration of temporary sites and improvements of St Fittick's were a condition of the Scottish Parliament allowing breakwater construction to go ahead.

1105: Note that an outdoor classroom was promised to the community as part of the South Harbour development – St Fitticks Park perfect location for this.

Consultation on the Energy Transition Zone

82: The respondent considers that there needs to be more, and wider community engagement given that the Torry Community Council was not functional at the time of consultation.

194, 195, 197, 198, 200, 202, 207, 210, 211, 215, 257, 538: The respondents were not made aware of the plans before the vote.

100, 352, 353, 359, 362, 787, 799, 822, 851, 856, 860, 898, 931, 1105, 1056: The respondents set out concerns relating to; the process of inclusion of the OP56 and OP61 in the Proposed Local Development, the period of public consultation and access to supporting documentation (given it was digital and only available online). This resulted in a lack of public awareness and consultation with relevant stakeholders.

68, 726, 736, 791, 799, 802, 806, 807, 849: The respondents set out concerns to the level of transparency and democratic process and oversight of the Proposed Local Development Plan with specific focus on OP56 and OP61. Respondents considered that during pandemic an inappropriate time for a consultation and that has made it challenging to engage with communities.

957: Concerned length and complexity of the Proposed Local Development Plan is overwhelming for ordinary citizens to understand.

957: Respondent was previously involved in the Aberdeen Harbour Board Nigg Harbour development as part of Torry Community Council. Several objections and concerns were raised and not taken forward. Concerned this consultation is lip service.

957: Questions whether all Councillors have read the entire Proposed Local Development Plan.

962: Questions to what extent the community was consulted prior to approval of the allocation by Council.

1020: Respondent suggests that normal planning procedure has not been followed correctly in allocating this site as another document (set out in the full representation) claim the site has already been decided.

Visual Impact of Development

78, 104, 119, 223, 229, 799, 860, 929, 1099: The respondents raise concerns relating to the visual impact of the development of the Energy Transition Zones on both the adjacent community of Torry and for vessels passing Aberdeen and entering the harbour. Respondents are concerned that development will impact of the current coastal and natural landscape of Aberdeen and this will have a negative impact on tourism.

509, 544: Loss of coastal strip and St Fittick's are important green areas.

888: The Energy Transition Zone allocations are also likely to have landscape and visual impacts that need to be well managed. Noting that the harbour and surrounding areas at Nigg Bay would create a new gateway into Aberdeen, good landscaping and design will

be key to trying to mitigate the effects of the change. Views and the experience of arrival via the railway should also inform the masterplanning approach.

Traffic Access to Energy Transition Zone and surrounding area

102, 119, 359, 533, 626, 1157: The respondents suggest development will result in increased traffic and that other roads be improved in order to accommodate industrial development at alternative sites. Access should also not go through green space areas or impact natural heritage.

643: Query whether a decision has been made on the road network.

1123: The respondent asserts that any new road route will be assessed after the Local Development Plan process and without any public consultation.

Property Value

533: The respondent is concerned the development will reduce house prices.

Air Quality and Noise Pollution

150, 153, 509, 779, 806, 1099: The respondents raise concerns that development of OP56 St Fittick's Park will have a negative impact on air quality, increase traffic, result in increased harmful emissions and noise generation. The creation of an industrial 'corridor' from the new harbour to Altens industrial estate would have a hugely negative impact on already poor air quality (due to Wellington Rd).

1123: The respondent considers that both OP56 and OP61 act as a green lungs and provides a partial shield from the emissions from boats within the harbour.

Masterplan

888: The respondent recommends that the Council produces a Planning Brief for OP56, which shows areas of constraint and the main developable areas, as well as any other aspects of the Council's Vision for the site. This Brief would then inform the Masterplan process. Masterplanning for the Energy Transition Zone needs to as far as possible meaningfully mitigate any impact on St Fittick's Park and other valued parts of the Green Space Network, for example at Doonies Farm. The respondent states they are happy to participate in that process.

892: The respondent does not consider that a joint Masterplan to be prepared by the developers once the site is allocated for development is the appropriate place to address these issues. The respondent does not consider that it has been demonstrated that flood risk, water quality, recreational access and habitat connectivity (as set out in the site allocation) can be adequately addressed at the masterplanning stage for this site.

OP61 - Doonies Farm

68, 77, 81, 161, 162, 163, 164, 181, 183, 184, 185, 187, 194, 197, 198, 0201, 202, 207, 209, 211 213, 215, 216, 217, 219, 220, 221, 222, 223, 225, 228, 237 238, 255, 256, 257, 262, 352, 362, 429, 495, 509, 533, 536, 537, 539, 544, 695, 699, 702, 751, 796, 797, 799, 801, 802, 803, 804, 805, 806, 809, 818, 819, 822, 825, 828, 845, 847, 849, 854, 860, 876,

921, 924, 929, 931, 943, 970, 972, 977, 978, 979, 981, 1008, 1010, 1017, 1102, 1117, 1157, 1161, 1181: The respondents raise concerns that the development of OP61 Doonies Rare Breeds Farm will result in the loss of a green space, educational (rare breeds) and wellbeing facilities which will be a loss to children, young people and the local community. Respondents stress that Doonies Rare Breeds Farm supports the breeding of rare animals and is a much loved and enjoyed amenity.

95: Respondent considers Doonies should receive support from the Council.

238, 255, 533, 798, 822, 828, 845, 847, 849, 851, 860, 878, 921, 922, 978, 1183: Concerns the rezoning and development will impact; the business, lead to the loss of staff jobs and displacement of animals.

536: Doonies Farm should remain as green space to alleviate climate change and protect biodiversity.

796: The farm is the only accredited farm of its type in Scotland.

801, 1181: Coastal walk and cycle path an asset to the area.

851: Comments raised in relation to the use and accessibility of the space due to personal health and the impact it has.

929: The removal of Doonies does not support the aims of the plan – Prosperous economy, prosperous people (including a child friendly city), prosperous place.

Impact on Tourism

182, 186, 220, 819, 825, 828, 849, 851, 860, 921, 922, 929, 931, 975, 1173: The respondents are concerned that the rezoning of Doonies Farm to Energy Transition Zone will result in the loss of visitor attraction for tourism and impact on the city's landscape.

359 OP61 Doonies Farm site acts as a gateway

626: Concern about public health impact of cruise ships. Consider that Aberdeen itself has little to offer cruise ship passengers, who would be transported to Aberdeenshire instead.

798: The respondent states there is opportunity for tourism with the new development on Nigg Bay, Greyhope trust plans for Dolphins watch facility. The coastal road will provide many facilities for tourists to spend money and enjoy.

1095, 1099: The respondents are concerned about negative visual impact on Greyhope Dolphin Watch project and users of the golf course.

Wastewater Treatment Plant

729: Note that site is identified in Energy Transition Zone Feasibility Zone Study Report which identifies the site within close proximity to Aberdeen City Wastewater Treatment Works. Section 4.11 of same report refers to technical relocation of the Nigg Wastewater Treatment Works.

Costs to relocate a Wastewater Treatment Works of this size would be considered prohibitive, technical difficult and any changes to the treatment process is highly likely to have detrimental effect on growth projections for both Aberdeen City and Aberdeenshire.

Early engagement with Scottish Water is advisable due to lengthy timescales for completing Network Impact Assessments. These should be initiated at early opportunity to avoid risk to proposed build out schedules.

Scottish Water has a Network Impact Assessment Team that will deliver sustainable strategic solutions to provide benefits to the area and add resilience to the network.

807: OP56 is the Wastewater Treatment Works and St Fittick's Park (including woodland) and East Tullos Burn. All offsite measures have yet to be achieved due to harbour not being completed. This designation would prevent the completion of these measures breaching the Aberdeen Harbour Revision Order.

892: The respondent does not consider that it has been demonstrated that the Scottish Water Treatment Works should form part of this proposed development site allocation.

Modifications sought by those submitting representations:

Object to Allocations of OP 56 and OP 61

22, 26, 68, 76, 77, 78, 81, 91, 102, 119, 150, 184, 195, 197, 198, 203, 207, 210, 211, 213, 215, 217, 219, 238, 255, 257, 262, 352, 359, 495, 499, 537, 702, 807, 851, 962, 970, 975, 1056, 1062, 1088, 1142, 1157, 1161, 1169, 1174: The respondents do not want OP56 St Fittick's Park or OP61 Doonies to be developed and the allocations to be removed from the Proposed Local Development Plan.

928: Remove OP56 St Fittick's Park from the Proposed Local Development Plan and allocated as a nature reserve.

806, 851: The respondents do not want OP61 Doonies to be developed and want the allocation to be removed from the Proposed Local Development Plan.

24, 25, 47, 48, 57, 85, 87, 93, 98, 198, 763, 1112, 1132, 1139, 1155: The respondents do not want OP56 St Fittick's Park to be developed and want the allocation to be removed from the Proposed Local Development Plan.

1099: The respondent wants OP56 St Fittick's Park, OP61 Doonies, OP62 Bay of Nigg and OP64 Former Ness Tip removed from the Proposed Local Development Plan.

Energy Transition Zone should be Located on an Alternative Site

25, 27, 28, 30, 50, 64, 68, 72, 76, 82, 151, 153, 194, 195, 197, 199, 200, 201, 202, 205, 207, 210, 211, 213, 215, 219, 223, 225, 229, 239, 255, 257, 359, 362, 495, 509, 533, 536, 538, 539, 626, 665, 702, 851, 928, 935, 943, 962, 970, 1032, 1059, 1088, 1095, 1115, 1139, 1161, 1173, 1174: The respondents want an alternative brownfield site to be used for the Energy Transition Zone

84: The respondent wants the Energy Transition Zone to be moved to Bridge of Don.

105: The respondent requests that the Energy Transition Zone be relocated to the Altens industrial estate.

137: The respondent requests that the Energy Transition Zone be developed at OP2 and surrounding sites rather than on green space.

705: The Energy Transition Zone should be relocated to an area which would have less impact wildlife and communities.

Loss of Green Space/Open Space

152, 161, 162, 163, 195, 199, 200, 667, 695, 708, 726, 1102, 1133: The respondent does not want further destruction of green space in Torry and asks that green spaces be preserved.

203: Designate OP56 and OP61 as urban green space.

222: Retain OP61 as green space.

539: Promote the coastal strip as a recreation area.

554: The respondent requests that the location of the Energy Transition Zone is reconsidered and the protection of St Fittick's Park, Doonies and the Coastal Strip.

945, 965: Retain OP56 St Fittick's Park as green space.

1032, 1056, 1057: OP56 and OP61 to be retained and safe guarded.

1115: Site to remain as Green Belt or Green Network area.

1123: In relation to both OP56 and OP61 the respondent requests the preservation and enhancement of the green, coastal areas of Torry and secure un-used or under-used existing brownfield sites away from open spaces in areas and buildings of need of investment for new jobs and green technologies

1174: Consideration of the prior use of the area as popular recreational space in an area where green space is becoming rare.

Green Belt

186, 194, 256, 854, 1133: Retain the site as Green Belt.

Cumulative Impact of Heavy Industry

50: The respondent does not want a harbour or incinerator in Torry.

945: The respondent requests the energy from waste facility be relocated.

Impact on Natural Environment and Biodiversity

104: The respondent requests that St Fitticks Park, Nigg Golf Course and the path be protected areas for people and wildlife. To build more green space, plant more trees to counteract pollution from the Energy Transition Zone and Harbour.

150: The respondent requests that the development be halted until environmental impact has been understood. Review of the project is required. Independent enquiry into the appointment of Dragados, and harbour land requirements.

970: Protect the wetlands of OP56 St Fittick's Park.

1174: In relation to both OP56 and OP61 to give consideration to the impact on the environment and increase use of wildlife corridors.

1176: In relation to OP56 and OP61 to protect the natural area from being converted into an industrial park.

OP61 - Doonies

161, 164, 165, 179, 181, 183, 185, 763, 978, 1117: The respondent requests that Doonies farm be retained.

181: The respondent requests a replacement site for Doonies farm.

1178: The respondent requests support for Doonies Farm.

Traffic Access to Energy Transition Zone and Surrounding Area

195, 197, 210, 213, 215, 223, 239, 255, 257, 495, 538, 970: Improvements are needed to the road network.

981: The respondent requests the removal of the remainder of the coast road from industrial usage possibilities.

OP64 - Former Ness Tipp

887: The respondent supports the identification of OP64 as a longer term opportunity requiring detailed site investigation.

910: The respondent requests the opportunity site should be amended to advise that only where the site is proven to be not required to support the expansion of South Harbour, should alternative uses, such as a solar farm be considered

Aberdeen Harbour South

212: The respondent requests the Harbour Development be removed from the Proposed Local Development Plan.

984: The respondent requests that goal posts put back up and play areas for kids and more paths for dog walkers that lead all around the 3 adjoining fields

Miscellaneous Modifications

957: The respondent requests a realistic plan for OP56 St Fittick's Park, OP61 Doonies and OP62 Nigg Bay which reflects the current situation.

962: Proposed Local Development Plan should recognise Torry as one of the principal Common Good areas and protect the green space for its people.

1105: Halt on the current process until an audit into Aberdeen City Council can occur. The terms and findings of this should be made public.

Summary of responses (including reasons) by planning authority:

General

The Energy Transition Zones, allocations OP56 St Fittick's Park and OP61 Doonies, have resulted in numerous representations which cover a wide range of sub issues. Many of these sub issues are separate such as the well-expressed concerns of members of the community relating to loss of open space or the loss of natural heritage through development. In order to fully respond to all the sub issues, it is important to establish the wider context and timeline as to why these allocations and their supporting policy have been included in the Proposed Local Development Plan. The production of a Proposed Local Development Plan is the result of an extensive process. To arrive at the point where a Proposed Local Development Plan can be published means that a number of statutory stages have been completed. However, over such an extended period of time wider issues, such as the changes to the economy, environment or national policy, can influence the content of an emerging Local Development Plan. Such changes mean that the final content of a Proposed Local Development Plan can be fluid until its publication. The paragraphs below sets out some of the major milestones in the process of producing the Proposed Local Development Plan and how external issues and policy changes, running parallel to the Proposed Local Development Plan's production, underwent rapid change which informed its final content.

The Proposed Local Development Plan allocates Opportunity Sites OP56 St Fittick's Park and OP61 Doonies as an Energy Transition Zone which would be the first of its kind in Scotland. The Energy Transition Zone is envisioned to be a catalyst for a renewable energy industry cluster in Aberdeen City and a bridge to decarbonise the North East's hydrocarbon energy industry. It is an ambitious concept which must be considered in the context of the fast-moving policy response at regional, national and international levels to addressing climate change and supporting the North East of Scotland's economic recovery and a diversification of its economy beyond the oil and gas sector.

The review of the Local Development Plan started with the non-statutory Pre-Main Issues consultation, which ran from 19 March to 28 May 2018. This included a Call For Sites. It resulted in the submission of 146 development bids from developers and landowners to have sites included in the Main Issues Report 2019 (CD XX). The development bids submitted at this point did not include land surrounding the Aberdeen Harbour South expansion.

In March 2019, the Council published a Main Issues Report (CD XX) and undertook a 10-week public consultation from 4 March 2019 to 13 May 2019. This was a discursive document summarising the main planning issues facing Aberdeen City. It outlined the major differences in approach to the extant Local Development Plan 2017. The Main

Issues Report (CD XX) linked closely to the process of Strategic Environmental Assessment. All proposals (preferred and alternative) put forward in the Main Issues Report (CD XX) were environmentally appraised and an interim Environmental Report (CDXX) was published alongside it. Alongside the Main Issues Report, a Development Options Assessment Report (CD XX), which detailed the assessments of the development options submitted to the Council, was published.

As a result of the Main Issues Report consultation, a number of subsequent development bids from developers and landowners were received. Relevant to Issue 17 were development bids submitted on behalf of the Aberdeen Harbour Board; B1204 – South Harbour Part 1, B1317 – South Harbour Part 2, B1318 – South Harbour Part 3, B1319 South Harbour Part 4 (CDXX). The proposals were understood to be for the allocation of land associated with the expansion of the Aberdeen South Harbour for port related activity, including tourism, marine and other industrial activity. The southern expansion of Aberdeen Harbour is identified as a National Development in the National Planning Framework 3 (CDXX) and has been the subject of substantial investment. The Aberdeen City Region Deal (CDXX) has provided funding of £25 million for the Scottish Transport Appraisal Guidance (STAG) appraisal and delivery of improved transport connections to the harbour south expansion. A preferred option for improved connections was approved by Aberdeen City Council in March 2021 (CD XX).

In the Development Options Assessments Report (CD XX) for the Proposed Local Development Plan these development bids were determined undesirable. A number of the criteria as to why these Bid Sites were considered undesirable are also contained within the representations on Issue 17 such as loss of Green Belt and loss of green space. It should be noted that at the time of development options assessment, these bid proposals did not include components or proposals which would make a meaningful contribution to addressing climate change, support the transition towards renewable energy or the decarbonisation of the North Sea energy sector. Subsequently, Invest Aberdeen commissioned Barton Willmore to undertake an Energy Transition Zone Feasibility Study (CD XX). This study undertook further consideration of these sites which resulted in an evidence base for the inclusion of sections of these development options in the Proposed Local Development Plan. Substantially reduced sections of development bid B13/17 have been included as allocated sites OP56 St Fittick's Park and OP61 Doonies in the Proposed Local Development Plan.

Parallel to the emergence of the Proposed Local Development Plan, a paradigm shift occurred in the attitudes of national governments to climate change. In 2018 the United Nation's Intergovernmental Panel on Climate Change published the landmark Special Report on Global Warming of 1.5°C (CDXX) which projected that unless rapid and substantial action was taken to reduce global emissions by 2030 global warming will surpass 1.5°C. In the following decades this will lead to the irreversible loss of the most fragile ecosystems, and crisis after crisis for the most vulnerable people and societies. In early May 2019 another United Nation's body, the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, issued a warning about the damage human beings are causing to the planet (CDXX). It found that the drivers of damage have accelerated over the past 50 years. It listed climate change as one of the top three causes.

In response to this, on 14th May 2019, the Scottish Government declared a global climate emergency. In an address to the Scottish Parliament the Climate Change Secretary Roseanna Cunningham stated that an emergency needs a systematic response that is

appropriate to the scale of the challenge. Nationally there is now a commitment for net zero carbon emissions by 2045 with interim targets for reduction of at least 56% by 2020, 75% by 2030 and 90% by 2040. At the end of 2020, the Scottish Government also published an update to its Climate Change Plan (CD XX). The Climate Change Plan update sets out goals relating to major sectors of the economy where reductions must be achieved. Under electricity outcome 1 it states, “*The electricity system will be powered by a high penetration of renewables, aided by a range of flexible and responsive technologies*”. Scotland’s Energy Strategy Position Statement (CD XX) sets out how such an ambitious change can be delivered making specific reference to the potential of the North East to lead an emerging hydrogen energy hub.

The emerging National Planning Framework 4 and its merging with Scottish Planning Policy will need to develop policies which can support the National Climate Change Plan’s targets (CDXX). The National Planning Framework 4 autumn position statement (CD XX) makes reference to the need to prioritise the types and locations of development that will help meet our emission reduction targets (Page 8) and that consideration will be given to whether proposed national developments can help us to deliver on this vision. The Energy Transition Zone is a candidate National Project in the emerging National Planning Framework (CDXX) which has received supportive submissions from Aberdeen City Council ([CD XX](#)), Scottish Enterprise ([CD XX](#)), the Aberdeen Harbour Board ([CD XX](#), [CDXX](#)) and Opportunity North East (CD XX).

Given both the international and national alignment towards reduction in emissions, the City Region, including Aberdeen City Council responded in a coordinated and ambitious manner. The Regional Economic Strategy (CD XX), originally published in 2015 in response to thousands of jobs lost due to the downturn in the oil and gas sector, aims to maximise economic recovery in the short term. In the longer term it looks to sustain and secure the well-being of the City Region and its people by delivering a more balanced and resilient economy and achieving inclusive economic growth that benefits all. It recognises the importance of infrastructure if the Region is to remain an internationally competitive business environment with transport connectivity, information and communications technologies, business land and property and housing all being key. Its ambition is to build upon regional strengths and to broaden and diversify the economy across other sectors – including renewables and it champions the benefits of collaboration between the public, private and third sectors, making specific reference to the highly regarded third level education institutions in the City Region. The Regional Economic Strategy (CD XX), underwent a refresh in order to consider the Climate Emergency in late 2019. The final refresh also considered the impact and recovery from the Coronavirus pandemic. The Regional Economic Strategy Refresh (CD XX) placed a greater emphasis on the City Region to aid the transition to Net Zero and that this must be done at speed. The refreshed Vision of the Regional Economic Strategy states “*In 2040, the Aberdeen city region provides outstanding economic opportunities, best-in country quality of life and a spectacular natural environment. It is: a net-zero city region that powers the nation and drives energy transition nationally and internationally*”. Specific reference is made to the Energy Transition as an enabling mechanism for a Green Recovery from the pandemic under opportunities, priorities and drivers “*Net Zero – a region with an integrated energy cluster that is a global leader in the development of energy transition and net zero carbon solutions. The strategic importance of the oil and gas sector remains of paramount importance in regard to the success of our ambitions. The £62m Scottish Government Energy Transition Fund will allow for the acceleration of capital projects to support our net zero ambitions*”. In terms of a physical manifestation of this, the Energy Transition Zone is

specifically referred to as a capital-intensive project which would help to achieve the Regional Economic Strategy's Vision.

The Infrastructure Commission for Scotland was established by Scottish Government to provide independent advice on the nation's Vision, ambition and priorities to create a 30-year infrastructure strategy. In January 2020 it published its first key findings report (CDXX). One of the recommendations, most relevant to this strategy is the statement that *"most of the underlying infrastructure that will be used in 30-years' time already exists today. It is therefore essential that these assets are most effectively and efficiently utilised, maintained and enhanced to net zero carbon readiness"*. In July 2020 the Delivery Findings report (CD XX) was published which focussed on prioritising an inclusive net zero carbon economy and enabling sustainable places. The location of the Energy Transition Zone adjacent to the Aberdeen Harbour South expansion specifically addresses Infrastructure Commission Scotland's objective of maximising and maintaining existing infrastructure. The sites allocated for the Energy Transition Zone have been chosen to expressly allow for interconnectivity with existing and emerging infrastructure, and in particular the South Harbour expansion, but also to address declining industrial areas that can be regenerated through a clustering with the Energy Transition Zone.

In May 2020 Aberdeen City Council also approved a plan to position the area as a Climate Positive City (CDXX) at the heart of the global energy transition going beyond 'net-zero' and supported by a Strategic Infrastructure Plan (Energy Transition) (CDXX) .

Regional Planning Context

The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) was approved by Scottish Ministers in August 2020 and sets the regional planning context for both Aberdeen City and Aberdeenshire Councils. The Aberdeen City and Shire Strategic Development Plan 2020 page 6 Vision is for an attractive, prosperous and resilient City Region with a diversified economy and that (CDXX) *"...Decision makers will have acted confidently and taken the courageous decisions necessary to further develop a robust and diversified economy. Both Councils will have taken a proactive approach towards development that: ensures the sustainable use of natural resources, the ability to live within the area's environmental capacity, can deal with climate change, and creates a more open, inclusive society"*. Paragraph 2.2 of the Aberdeen City and Shire Strategic Development Plan 2020 further sets out that if the Scottish Government's central purpose of increasing sustainable economic growth is to be delivered, a key aim of the plan is to *"take urgent action on the challenges of climate change"*. The Energy Transition Zone is therefore aligned with the Aberdeen City and Shire Strategic Development Plan 2020 Vision and the Aims within it. It will aid the diversification of the regional economy through supporting renewable energy and take action on climate change by aiding the decarbonisation of the energy sector.

Support

843, 887, 892, 925: Support is noted.

887, 892, 910: It is not considered appropriate to include additional allocations such as OP64 Former Ness Tipp as a component of the Energy Transition Zones. Both OP56 and OP61 are considered to be substantial and suitably located allocations which will support the development of an Energy Transition Zone. OP64 Former Ness Tip is an allocation in the extant Local Development Plan 2017 (CDXX, CDXX) and has been carried forward to

the Proposed Local Development Plan. Its current allocation as a solar farm is an acknowledgement of the challenges in the use and delivery of a site which was historically used for landfill. Additionally, OP64 does not have the same accessibility or suitable topography which OP56 and OP61 have.

Objects to allocations of OP 56 and OP 61

70, 72, 151, 152, 219, 495, 499, 509, 544, 751, 779, 854, 856, 878, 921, 928, 935, 945, 965, 787, 1032, 1056, 1062, 1088, 1115, 1123, 1157, 1161, 1176: Objections to the allocation of OP56 St Fittick's Park noted and are responded to under specific sub issues set out below.

162, 163, 164, 178, 179, 181, 184, 185, 186, 187, 195, 208, 231, 509, 536, 796, 798, 800, 801, 803, 804, 805, 806, 809, 818, 819, 822, 825, 828, 845, 849, 851, 854, 860, 876, 879, 884, 921, 922, 928, 929, 935, 968, 1010, 1017, 1032, 1056, 1062, 1088, 1112, 1115, 1123, 1157, 1161, 1176, 1178, 1181, 1183: Objections to the allocation of OP61 Doonies noted and are responded to under specific sub issues set out below.

General Queries on the Energy Transition Zone

432: The respondents general concern is noted and responded to under specific sub issues set out below.

643: The allocation of both OP56 and OP61 in the Proposed Local Development Plan results in a combined total allocation of 34.5 hectares. It is unknown how much of the sites will need to be developed in order to delivery suitable platforms for an Energy Transition Zone and further clarity would emerge through the masterplanning process. The ultimate design and delivery would only be known through the submission of planning applications so it cannot be speculated as to the eventual built form. It is the function of the Local Development Plan to establish the principle of development on an opportunity site and then establish further detail through the other tiers of the planning process. There are unlikely to be operational wind turbines on the subject sites as they are outwith preferred (Group 3) areas identified in the Proposed Local Development Plan's Onshore Wind Spatial Framework (CD XX).

Development Options Assessment

807, 854: The respondent's references have been considered in the general introduction to this Issue.

Energy Transition Zone should be Located on an Alternative Site

28, 30: The respondents understanding of the need for an Energy Transition Zone and concerns regarding its location are noted. They are addressed below.

22, 25, 26, 27, 28, 30, 76, 85, 91, 98, 100, 102, 104, 105, 119, 153, 181, 182, 185, 197, 198, 199, 200, 203, 207, 209, 211, 213, 215, 217, 219, 220, 221, 222, 229, 239, 255, 256, 257, 352, 353, 359, 362, 432, 495, 509, 533, 544, 562, 699, 702, 705, 726, 791, 798, 799, 806, 807, 828, 831, 878, 898, 921, 924, 928, 929, 943, 962, 972, 980, 981, 1105, 1115, 1117, 1123, 1133, 1139, 1155, 1169, 1173, 1181: The respondents have queried why the Energy Transition Zone cannot be located in existing established industrial areas which

would benefit from regeneration. The premise of the Energy Transition Zone is set out in Appendix 2 of the Proposed Local Development Plan that OP56 “*will support renewable energy transition related industries in association with Aberdeen South Harbour. Any development at this site must have a functional association with the South Harbour which precludes it being located elsewhere, such as the size of the infrastructure preventing transport from other locations or requiring ‘roll on / roll off’ level access to the South Harbour*”. As such in the context of OP56 St Fittick’s Park the desired use of the site and ongoing activity require proximity to a harbour.

As it set out in paragraph 1.2.4 of the Proposed Local Development Plan’s Vision “*The Energy Transition Zone has been placed adjacent to Aberdeen’s South Harbour Extension and the rail line to maximise the development opportunities*”. Aberdeen Harbour South is a National Development in the National Planning Framework 3 (CDXX) and when completed will be an important piece of strategic infrastructure for the City Region and its economy. The energy transition of Aberdeen, Scotland and the United Kingdom will involve a massive shift in the economic focus of the North Sea from Oil and Gas to renewable energy delivery and supply chain. A likely component of this shift will be offshore wind which requires harbours and facilities of scale to assemble and move the required kit to offshore locations. Thus, delivering windfarms of a scale as to decarbonise our energy supply. Components of renewable technologies are unlikely to be easily transported through an existing industrial estate given their size and it is unlikely the existing road network, without considerable upgrading and disruption, would facilitate their movement. In terms of efficiency and the ability to distribute readily proximity to a harbour is essential.

The harbour is a strategic piece of infrastructure and energy transition a national strategic goal. The energy transition will mean sustainable and sustained job creation and economic growth in the renewables sector in the City Region for many years. Locating an Energy Transition Zone to facilitate such an endeavour adjacent to the necessary infrastructure to deliver the transition is appropriate land use planning.

Additionally, there is the question of time. It is important to be cognisant of the time left remaining to achieve the target of net zero and that the transition away from hydrocarbons to renewables must be rapid. The Aberdeen Harbour South is well into its construction and will be operational within a couple of years. This means an Energy Transition Zone could be operational relatively shortly after the harbour’s completion. Aberdeen and Scotland are not the only parties pursuing the economic benefits of such a rapid change and shovel ready projects will offer a competitive advantage. To consider an alternative site which would require access by road would require detailed transportation studies, Scottish Transport Appraisal Guidance (STAG) studies, consultation, the likely compulsory purchase of land and the ultimate delivery of road improvements. Such delays could lead to alternative and more ready locations become the focal points facilitating the energy transition.

There is nothing in the Proposed Local Development Plan which would preclude the regeneration of the existing industrial areas which have been referred to by the respondents. The increased levels of vacancy in these areas is a result in the downturn of the Oil and Gas sector. The Energy Transition Zones aims to redress this downturn and be a catalyst for a wider economic recovery which would avail the existing industrial land allocations.

137: OP2 has been allocated for 550 homes in the Proposed Local Development Plan. The infrastructure adjacent to OP2 and the wider employment allocations in its vicinity are

served only by road. As stated above the premise of the Energy Transition Zone is its proximity to key infrastructure which can facilitate the development, assembly and distribution of large-scale renewable energy technologies.

726, 791, 807, 1105, 1056: The respondent asserts the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) does not require the allocation of additional employment land. Page 36 of the Aberdeen City and Shire Strategic Development Plan states: “*To make sure there is at least 60 hectares of marketable land available to businesses at all times in a range of locations within Aberdeen City*”, this is viewed as a target not a restriction and that if the Council wishes to allocate additional employment land above this it can do so.

Paragraph 5.9 of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) also states it is a priority to make sure “*that there is enough of the right type of land for business use, in the right places, will give the City Region a competitive advantage*”. It is considered that the Energy Transition Zone is in alignment with the Aberdeen City and Shire Strategic Development Plan 2020 as this is the correct zoning, in the correct location which will give the City Region a strategic competitive advance in the energy transition. Such an advance offers the potential of economic development in the renewable sector which can in the short to medium term aid the City Region’s diversification away from the Oil and Gas sector and in the long term be a leader in the renewables sector.

Supporting Evidence for an Energy Transition Zone

99: The concept of energy transition has yet to be defined but the Aberdeen Energy Transition Zone Feasibility Study (CD XX) describes energy transition as 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 and solar. While there are other areas where such a site could be developed, they would not be to the economic advantage of the City Region or Scotland. Transport infrastructure for the site would be better determined following a masterplanning process to determine what are the requirements to enable the delivery of the site and mitigate any resulting transportation impacts.

539: The Aberdeen Energy Transition Zone Feasibility Study (CD XX) makes specific reference to links between the Energy Transition Zone and existing industrial areas. Point 5 on page 14 of the Study considers common attributes that have encouraged and enabled the delivery energy transition related uses and states “*Proximity to existing industrial areas, close to port operations, is important to accommodate potential supply chain activities and increase efficiencies in moving components/service*”. Not only has this been considered it indicates potential for offsite and wider economic benefit.

726, 791, 878, 1115: The respondents are correct that a wider Energy Transition Zone is considered in the Energy Transition Zone Feasibility Study (CD XX) and that this wider zone can accommodate components outside the allocated sites OP56 and OP61. However the Study is direct in that it states a minimum footprint of 30 hectares is necessary, (with 34.5 hectares allocated), and that land needs to be directly adjacent to a harbour, with flat topography - to allow for as much land in one location that has direct, level access to a harbour. Such land is specifically required to accommodate offshore renewable energy manufacture and assembly - considered to be critical to an Energy Transition Zone within Aberdeen.

1133: The Proposed Local Development Plan's allocation of OP56 and OP61 is informed by the Energy Transition Zone Feasibility Study (CD XX).

Loss of Green Belt

150, 152, 153, 229, 238, 702, 856, 878, 1123: Both sites are zoned as NE2 Green Belt in the extant Local Development Plan 2017 (CDXX). The Proposed Local Development Plan changes this zoning to B5 Energy Transition Zone. It is therefore accepted that their development would result in the loss of what is currently Green Belt. However, paragraph 49 of Scottish Planning Policy (CDXX) states that one of the purposes of Green Belt is "*directing development to the most appropriate locations and supporting regeneration*". For the reasons outlined above it is considered that OP56 and OP61 are the most appropriate locations for energy transition. This is why the Proposed Local Development Plan has altered the Green Belt boundaries in these locations in order to accommodate energy transition.

Loss of Green Space/Open Space

28, 30: The respondents' concerns regarding the loss of open space to the community and the role green spaces play in mitigating the impact of climate change is noted. All of the Proposed Local Development Plan's policies carry equal weight and importance and need to be taken into account in the decision-making process. Balancing often conflicting interests in different situations is a large part of the planning process.

24, 25, 26, 25, 28, 30, 47, 48, 50, 57, 64, 68, 69, 70, 72, 76, 77, 78, 81, 84, 85, 87, 91, 97, 98, 99, 102, 104, 105, 119, 137, 150, 151, 152, 153, 194, 197, 198, 199, 200, 203, 205, 207, 209, 210, 211, 213, 215, 216, 217, 219, 220, 221, 225, 237, 255, 257, 261, 353, 359, 362, 432, 495, 499, 509, 538, 539, 544, 625, 626, 665, 667, 695, 699, 705, 708, 726, 763, 779, 791, 807, 831, 849, 851, 854, 856, 878, 921, 928, 943, 957, 962, 970, 972, 975, 980, 984, 945, 1032, 1057, 1059, 1088, 1095, 1099, 1102, 1105, 1112, 1115, 1123, 1173, 1176: The respondents' concerns about the loss of green space and the benefit this green space offers to the surrounding community and area are noted. OP56 St Fittick's Park has an area of 18.2 hectares. This would mean that approximately 15 hectares of St Fittick's Park would remain untouched by the allocation.

The East Tullos Burn runs through the site and there is also a Wastewater Treatment Plant present. The remainder of the site is relatively free of constraints. As has been stated above a flat site, located close to a harbour is required to enable the delivery of an Energy Transition Zone.

The principle of such a use at OP56 and OP61 is supported at both a national and regional planning level as has been set out above. Additionally, Scottish Planning Policy 2020 (CD XX) introduces a presumption in favour of development that contributes to sustainable development. Paragraph 28 of Scottish Planning Policy 2020 states "*The planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term*". The Energy Transition Zone aims to support economic development in the City Region and also aid the achievement of wider environmental targets. It is also a long-term project.

With regard the bullet points set out in paragraph 29 of Scottish Planning Policy 2020 (CD XX), due weight is to be given to net economic benefit. The Energy Transition Zone is

responding to regional economic issues, challenges and opportunities and aligns with the local economic strategy or in this case the Regional Economic Strategy (CD XX). The allocation of the sites in close proximity to the Aberdeen Harbour South makes efficient use of existing capacities of land, buildings and infrastructure.

There is a planning judgement to weigh up in developing a considerable area of public green space, and therefore removing that asset from a community, in order to deliver a project which could deliver wide ranging and long term economic benefits for the City Region while making a contribution to addressing the climate challenge. It is the Council's position that, for the wider good, the development of this component of St Fittick's Park is, while unfortunate, necessary to ensure the City Region's economic diversification and to be a force in the emerging energy transition.

78, 219, 539, 807, 1095: It is not disputed that public funding in combination with support from the local community led to the rehabilitation of the East Tullos Burn. Such collaborative working has resulted in an award-winning end result. However, the use of public funding to rehabilitate a site or even develop a site does not preclude its re-designation to other purposes which could be considered to be in the wider public good. It is unfortunate that the most suitable site for an Energy Transition Zone is located at St Fittick's Park. However, this should not rule out the consideration of a site which has the potential to establish a development that will aid the City Regions economic transition and deliver climate change goals.

843: Further studies will inform the potential development and delivery of OP56 and OP61. However the Aberdeen Energy Transition Zone Feasibility Study (CD XX) as discussed above in sub heading Supporting Evidence for an Energy Transition Zone sets out why such a development is beneficial and needed and also why it requires to be situated close to a harbour.

726, 791: The Aberdeen Harbour Revision Order (CD XX) section Schedule of Mitigation Measures relates to the construction of the Aberdeen Harbour South and the boundary of that project. While Energy Transition Zone uses are permitted under Policy B5 in the Proposed Local Development Plan they are distinct developments. The Aberdeen Harbour South must separately respond to any requirements of the Construction and Environmental Management Document required by the Aberdeen Harbour Revision Order.

888: The respondent's concerns are noted. The allocation of OP56 unambiguously means that the Proposed Local Development Plan establishes the principle of development at this allocation. Should the site be developed, there will be loss of sections and elements of St Fittick's Park. Development and mitigation of the development is set out in Appendix 2 of the Proposed Local Development Plan in relation to OP56.

1133: The respondents concerns are noted. OP56 is adjacent to the Nigg Bay Site of Special Scientific Interest which in turn is situated within OP62. OP62 has been allocated for the delivery of Aberdeen Harbour South and this is under construction. The Bay of Nigg Development Framework (CDXX) considered the Site of Special Scientific Interest and recommended that an Environmental Impact Assessment be undertaken. An Environmental Statement was undertaken to support planning application 151742 (CDXX, CDXX) for the Aberdeen South Harbour and permission was ultimately granted. Appendix 2 of the Proposed Local Development Plan requires that OP56, OP61 and OP62 produce a joint Masterplan to appropriately inform and guide future development. A key component of such a Masterplan would involve the consideration of the Nigg Bay

Site of Special Scientific Interest. Additionally, the Proposed Local Development Plan requires all relevant environmental assessments will be required. As such due consideration has been given and will be given to Nigg Bay Site of Special Scientific Interest.

1155: The respondent's objection to the loss of green space is noted. The temporary use and ultimate remediation of a section of land for the storage of materials to deliver OP62 and Aberdeen Harbour South is managed and enforced by conditions of the relevant planning permission 151742 (CDXX, CDXX). This matter is outwith the scope of the Examination of the Proposed Local Development Plan.

1169: Objection is noted. (SD XX attached a link to a petition to keep hands off Torry Greenspace)

78, 82, 726, 791, 807, 856, 957, 1056, 1099, 1132, 1133, 1139, 1142, 1155, 1157, 1161, 1174: The respondents' concerns regarding the potential conflict between the allocation of OP56 and OP61 and Policy NE2 are noted. All of the Proposed Local Development Plan's policies carry equal weight and importance and need to be taken into account in the decision-making process. Balancing often conflicting interests in different situations is a large part of the planning process. The respondents are also concerned that the development of green space would result in the loss of carbon sinks.

There is discretion, as provisioned under Proposed Policy NE3 - Our Natural Heritage, to allocate or develop on sites which contain green space. Proposed Policy NE3 states "*Where detrimental effects are still unavoidable, development will only be supported where these adverse effects are clearly outweighed by social, environmental or economic benefits at a level which is at least equal to the designation's or species' importance (international, national or local)*". It is considered that the wider environmental and economic benefits of the Energy Transition Zone outweigh its disbenefits. Given the express purpose of the Energy Transition Zone is to support the development and delivery of renewable energy it is considered it has potential to make a considerable difference in the reduction of carbon emissions than if OP56 and OP61's latent potential went undelivered.

Cultural Heritage and the Historic Environment

24, 78, 91, 203, 427, 787, 807, 935, 1056, 1095: The respondents concern for cultural and historic heritage are noted. St Fittick's church is a Scheduled Monument. St Fittick's is located outwith the allocation of OP56 and therefore its integrity should not be affected by the development of the site. However, and rightly, consideration would need to be given to such a monument in terms of the scale and context of the development of OP56 and OP62 and its potential impact on St Fittick's church. Appendix 2 of the Proposed Local Development Plan requires that OP56, OP61 and OP62 produce a joint Masterplan to appropriately inform and guide future development. A key component of such a Masterplan would involve the consideration of heritage and this has been considered in detail in the adopted Nigg Bay Development Framework (CD XX).

Cumulative Impact of Heavy Industry

27, 47, 48, 68, 69, 72, 76, 82, 85, 97, 105, 151, 153, 181, 201, 359, 362, 499, 667, 699, 702, 726, 763, 791, 856, 935, 945, 957, 1095, 1123, 1139, 1155, 1174: The respondents' concerns relating to the level of large scale projects of a heavy nature in proximity to the

community of Torry are noted. Projects include OP107's Energy from Waste Facility, the Wastewater Treatment Plant at St Fittick's Park and Aberdeen Harbour South at OP62. The Energy from Waste Facility needed to be located in an industrial area which had strong road links. This is as appropriate a location as possible for such a development and is 300 metres away from the closest residential development. It is the intention of the Council to use the operational waste from energy facility to be the catalyst for a district heating system which would serve the community of Torry. The Wastewater Treatment Plant and the Aberdeen Harbour South projects could only be located in Nigg Bay. The Harbour needed deep water, and this was the best location and the Treatment Plant needed a location which could connect with the wider sewerage system and be located away from established residential development whilst also being a discharge point.

While it is understandable that there could be a perception that Torry has deliberately become a focal point for such developments this is not the case. It is a combination of geography and infrastructure which has resulted in these projects locating there. It is the same with the Energy Transition Zone. The purpose of the Examination is to allow independent scrutiny of the issues raised and to help ensure that any decisions taken are fair and well-considered. If accepted, any development at the site would be subject to both a masterplanning process and a subsequent planning application. Due consideration would be given to the potential negative impacts of any proposals.

Impact on Mental Health and Wellbeing of Community

50, 82, 87, 91, 98, 150, 151, 195, 198, 201, 202, 203, 207, 209 211, 212, 213, 217, 219, 220, 221, 225, 229, 237, 239, 255, 257, 352, 353, 533, 537, 538, 539, 705, 763, 779, 878, 921, 928, 943, 957, 962, 1056, 1057, 1088, 1105, 1123, 1132, 1133, 1155, 1157: The respondents' concerns of an impact on the mental and physical health of their community through the loss of green space is noted. There has been an increase in the appreciation and value of green spaces as a result of the pandemic and it is understandable that any community would be concerned with loss of green space. The Proposed Local Development Plan takes cognisance of wellbeing and the value of green space and the natural environment. Policies contained in the Health and Wellbeing and the Protecting and Enhancing the Natural Environment sections of the Proposed Local Development Plan have been developed in conjunction with all stakeholders.

The Proposed Local Development Plan must be considered in its entirety and this is set out in paragraph 2.11 "*It is important to remember that development proposals will be assessed against a number of policies within the Local Development Plan, so it must be carefully considered as a whole*". As discussed above in the response to submissions relating to the loss of green space the Proposed Local Development Plan's policies carry equal weight and importance and need to be taken into account in the decision-making process. Balancing often conflicting interests in different situations is a large part of the planning process.

There is discretion, as provisioned under NE3, to allocate or develop on sites which contain green space. Proposed Policy NE3 states "*Where detrimental effects are still unavoidable, development will only be supported where these adverse effects are clearly outweighed by social, environmental or economic benefits at a level which is at least equal to the designation's or species' importance (international, national or local)*". It is considered that the wider environmental and economic benefits of the Energy Transition Zone outweigh its disbenefits. While in no way debasing the respondents' concerns

regarding wellbeing there is also the consideration of economic wellbeing. It is vital that where possible meaningful interventions which can help to support the City Region's economy, and in tandem the economic wellbeing of its residents, are undertaken. There are also serious consequences to mental health and wellbeing should there be a long-term decline in the City Region's economy.

It is asserted that the Energy Transition Zone is in conflict with the Local Outcomes Improvement Plan (CD XX). The Local Outcome Improvement Plan (CD XX) considers a wide range of subjects with one of those being a Prosperous Economy. A key driver to achieve the economic stretch outcomes of the Local Outcome Improvement Plan (CD XX) is on page 14 point 1.1 "*Diversification of the economy into other growth sectors including wider energy related sectors; tourism; food and drink; life sciences; health and social care and construction*". Additionally, there is a specific stretch outcome in relation to climate change; outcome 14 states "*Addressing climate change by reducing Aberdeen's carbon emissions by 42.5% by 2026 and adapting to the impacts of our changing climate*"

As such it is considered that the Energy Transition Zone would be a valuable asset in the delivery of the Local Outcome Improvement Plan's stretch outcomes.

68: Table 1 of Proposed Local Development Plan sets out where policies align with the United Nations Sustainable Development Goals. Policy B5 which sets the policy context for allocations OP56 and OP61 aligns with Development Goals 3,6,7,9,11,12,13,14, and 15.

533: As stated above the Proposed Local Development Plan must be read and considered as a whole rather than focusing on one policy or section.

665: The respondent asserts that children's education will be affected by the allocation of OP56 and OP61. It is not possible to quantify the impact on the education of children which would result from the allocation of these two sites. However, it is assumed the respondent is concerned that this could take place through the loss of green space. Justification for the allocation of the sites has been set out above.

Impact on Natural Environment and Biodiversity

27, 28, 30, 57, 69, 76, 78, 81, 85, 91, 93, 97, 99, 102, 104, 105, 150, 153, 199, 201, 203, 212, 219, 221, 255, 353, 359, 432, 499, 533, 539, 665, 695, 705, 726, 751, 763, 779, 787, 791, 807, 856, 921, 928, 935, 943, 980, 984, 1105, 1032, 1056, 1057, 1088, 1095, 1099, 1123, 1132, 1133, 1157, 1161, 1176: The respondents' concerns are noted. In terms of biodiversity the Development Options Assessment (CD XX) noted that both sites are zoned as Green Space Network and have habitat interest. The Balnagask to Cove Local Nature Conservation Site (CDXX) runs adjacent to the sites while there is a Site of Special Scientific Interest immediately east of OP56. It is accepted that designated species have been recorded for the site. As discussed in the response to submissions which related to the loss of green space and the cumulative impact of development on the community, the Proposed Local Development Plan's policies carry equal weight and importance and need to be taken into account in the decision-making process. Balancing often conflicting interests in different situations is a large part of the planning process.

72: The respondent's comments are noted.

427, 495, 892, 928, 1088, 1105, 1112, 1123, 1132, 1155, 1056: While public funds have been used for the rehabilitation of the East Tullos Burn as set out above this does not preclude the inclusion of OP56 as an opportunity site in the Proposed Local Development Plan. The respondents state that the area has only recently been enhanced for biodiversity and natural flood management. However, as discussed above, the recently declared climate emergency and our need to address economic diversification has led to a rethink over the role of parts of St Fitticks Park. At the same time, the masterplanning of the site and any subsequent planning applications will need to address mitigation measures and may themselves lead to environmental improvements.

856: The Environment Report is an iterative process and will continuously assess the contents of the Proposed Local Development Plan.

980: Each time a Development Plan is reviewed there are amendments and updates to some policies. The addition of Policy B5 Energy Transition Zones is an instance of this. While there may have been some changes to Policy NE2 Blue and Green Infrastructure the section in NE3 Our Natural Heritage quoted above regarding the loss of green space has been carried forward from the extant Local Development Plan 2017 (CDX).

Flooding

533, 539, 537, 763, 892, 928, 1057, 1095, 1155: Flooding has been assessed in the Development Options Assessment (CDXX). Appendix 2 of the Proposed Local Development Plan states that a flood risk assessment will be required. Flooding and its management would be given detailed consideration through the masterplanning process.

Community Benefit

427, 537: The respondents' concerns are noted. Issues relating to community benefit sit outwith the examination of a Proposed Local Development Plan. Community benefit can be considered during the procurement process for the public sector.

1105, 1056, 1088, 1095, 1155: It is asserted the Energy Transition Zone will have an impact on community led projects. While the development will result in a loss of green space it is not certain it will negatively impact on food growing spaces as has been referred to by the respondents. Granite City Growing (CD XX) is the Council's food growing strategy references St Fittick's Edible Garden which is located outwith the allocation of OP56 and on the opposite side of St Fittick's Road.

1105: The development of OP107 has been subject to a separate planning process and that development as well as any potential heat network is a separate consideration to the Energy Transition Zone.

1105: Concerns relating to Greyhope Bay are addressed below under impact on tourism. OP56 and OP61 are Council owned sites, (excepting the wastewater treatment plant). The maintenance, responsibility and ongoing operation of the sites sits with the Council and not residents.

1155: Reference is made in the Energy Transition Zone Feasibility Study (CD XX) to the potential for job creation. This is a strategic project and employment generation may take

some time to be realised. The Aberdeen Harbour South project is separate to the Energy Transition Zone, still under construction and not yet operational.

OP62 - Aberdeen Harbour South Project

195: The ongoing delivery or contractual status of the Aberdeen Harbour South project is outwith the scope of a Proposed Local Development Plan examination.

220: The associated works and temporary area of works to deliver the Aberdeen South Harbour sit outside the scope of the examination of the Proposed Local Development Plan.

432: Such a mitigation and compensation plan sit outside the scope of the examination of the Proposed Local Development Plan.

807: The Aberdeen Harbour Revision Order (CdXX) is a separate piece of legislation to that of the Development Plan. Any environmental considerations taken in regard to complying with the Aberdeen Harbour Revision Order must be considered within that legal framework. There is an Environment Report (CDXX) which supports the Proposed Local Development Plan.

856: Permission has been granted for the development of the harbour and work is ongoing. This cannot be halted due to the status of the Community Council.

887: Support noted.

1056, 1059, 1105, 1133: The decision notice for planning permission 151742 (CD XX) includes Conditions 2 and 3 which relate to the use of temporary areas for construction purposes. Matters specified in these conditions were subsequently considered by Council and as the delivery of the Aberdeen Harbour South is ongoing, so is the use of these areas on a temporary basis.

1105: The Council holds no record of development obligations for Aberdeen Harbour South for an outdoor classroom. There may be a separate agreement which is outwith the scope of the Proposed Local Development Plan examination.

Consultation on the Energy Transition Zone

82: During the consultation the Local Development Plan team gave detailed and area specific presentations for Community Councils on the Proposed Local Development Plan. While the Torry Community Council was not functional at the time a presentation was instead given to the Torry Locality Partnership on the 24th June 2020.

194, 195, 197, 198, 200, 202, 207, 210, 211, 215, 257, 538: The consultation of a Proposed Local Development Plan only commences once Council has approved the document and its consultation. The Proposed Local Development Plan, its supporting documents and a committee report were published on the Council's website in advance of the meeting of Full Council on the 2 March 2020.

100, 352, 353, 359, 362, 787, 799, 822, 851, 860, 898, 931, 1105, 1056: The process for the allocation of both OP56 and OP61 has been discussed above.

Concerns relating to engagement, public consultation and use of digital only are addressed below.

68, 726, 736, 791, 799, 802, 807, 806, 849: The respondents' concerns relating to undertaking a consultation on a Proposed Local Development Plan during a pandemic are noted. The Proposed Local Development Plan was approved at the meeting of Full Council on the 2nd March 2020. This was before the United Kingdom went into lockdown and restrictions in order to aid the control of the spread of the coronavirus. The Council awaited guidance from the Chief Planner and also legislation informing us about conducting a consultation during a pandemic before it began the consultation on the Proposed Local Development Plan. This is discussed in detail in the Report of Conformity (CD XX) but set out here for the purposes of clarity.

The Coronavirus (Scotland) Act 2020 (CD XX) requires the Council to consider whether any of its actions would be likely to impede its ability to take effective action to prevent, protect against, delay or otherwise control the incidence or transmission of coronavirus. This requires the Council to promote the national policy of social/physical distancing. A national lockdown commenced in Scotland on 23 March 2020. The lockdown required the closure of all Council offices, libraries and for staff to work remotely. Aberdeen City began its first phased exit from lockdown on 28 May 2020. The second phase of exiting lockdown commenced on 18 June 2020 and the third phase began on 9 July 2020. During all three phases it was advised the Council offices and libraries remain closed and that staff work remotely. In order to compensate for the disruption caused by the pandemic the consultation period for the Proposed Local Development Plan was extended to over 14.5 weeks between 20 May 2020 – 31 August 2020.

On 3 April 2020, Scotland's Chief Planner John McNairney issued a letter (CD XX) which set out how Local Authorities should undertake their responsibilities in response to the pandemic. This letter outlined the provisions within the Coronavirus (Scotland) Act which allows the publication of the Proposed Local Development Plan online in lieu of the requirement to make them available for physical inspection. The letter also outlined the difficulty in receiving physical representations while offices are closed.

There is a statutory period of review for a Local Development Plan and possible legal consequences should this not be met. Paragraph 24 of Circular 6/2013 Development Planning (CD XX) states "*planning authorities are expected to move quickly from the Main Issues Report through to the Proposed Plan and towards submission to Scottish Ministers and adoption*". Having completed the Main Issues Report consultation, being mindful of the Circular and the statutory review period additional sites, which had come through the call for sites and Main Issues Report Consultation, were selected for inclusion in the Proposed Local Development Plan. With no idea at the time as to when restrictions might come to an end it was determined that, given the above legal context and advice from the chief planner, it was right to go ahead with a consultation in order to maintain an up-to-date Local Development Plan.

In addition to the extended duration of the Proposed Local Development Plan consultation all documents were published on the Council's website, extensive neighbour notification was undertaken, newspaper notices and social media posts were used periodically during the course of the publication and engagement was undertaken where possible with Community Councils.

With regard democratic oversight, Elected Members were briefed by Officers from the Local Development Plan team on the contents of the Proposed Local Development Plan in advance of the 2 March 2020 Full Council meeting. Committee papers comprising a Report on the Proposed Local Development Plan, as well as the Proposed Local Development Plan itself and all supporting documents were all made available in advance of the Full Council meeting (CDXX – Committee Report).

957: The Proposed Local Development Plan is a technical document which must cover a wide-ranging number of themes. Every effort has been made to set it out in a manner that is both accessible, in terms of plain English, and also be as succinct as it can be.

957: A robust and lengthy period of consultation was undertaken, as set out above, for the Proposed Local Development Plan. It is important to stress that the Examination of the Proposed Local Development Plan is a different process to that of a masterplanning process or a planning application process. As such there are numerous points where respondents' submissions are considered.

957: Elected Members were briefed by Officers from the Local Development Plan team on the contents of the Proposed Local Development Plan in advance of the 2 March 2020 Full Council meeting. Committee papers comprising a Report on the Proposed Local Development Plan, as well as the Proposed Local Development Plan itself and supporting documents were made available in advance of the Full Council meeting (CDXX – Committee Report).

962: The period between the consultation on the Main Issues Report, reflection on submissions received, and the final content of the Proposed Local Development Plan can result in new content for a Proposed Local Development Plan. It is therefore only right to consult on the settled view of the Council of the Proposed Local Development Plan rather than potential content between the Main Issues Report and the Proposed Local Development Plan stages.

1020: As set out in the Report of Conformity (CD XX) which supports the Examination of the Proposed Local Development Plan all statutory requirements regarding the consultation of the Proposed Local Development Plan have been met. While OP56 and OP61 have been included in the Proposed Local Development Plan the Examination will be carried out by Reporters who are independent of the Council and who will make recommendations on the final content of the Plan. These recommendations are largely binding on the Council.

Visual Impact of Development

0078, 0104, 0119, 223, 229, 799, 860, 929, 1099: The respondents raise concerns relating to the visual impact of the development of the Energy Transition Zones on both the adjacent community of Torry and for vessels passing Aberdeen and entering the harbour. Respondents are concerned that development will impact of the current costal and natural landscape of Aberdeen and this will have a negative impact on tourism.

It is not disputed that there will be a visual impact should the Energy Transition Zone be developed. The respondents are correct that the Energy Transition Zone would be visible from both the immediate area and also for vessels approaching the Aberdeen Harbour South. OP56 and OP61 are located inland behind coastal areas designed as developed or undeveloped on the Proposed Local Development Plan's constraints map. OP56 is part of

the developed coast. OP61 is located adjacent to one of the largest contiguous zoning of Business and Industrial land in the City. This means both sites would fall under the consideration of Proposed Policy N4 – Our Water Environment should they be developed. There are exemptions within the policy which enable the consideration of proposals in such areas those relevant to the Energy Transition Zone are; The development dependent on that coastal location given the purpose and operation of the development, there is no other suitable site, including brownfield land in the longer term there is an overriding environmental benefit from the proposal. Any future proposals would be assessed against Proposed Policies D4 – Landscape and D5 Landscape design and their supporting Aberdeen Planning Guidance.

With regard to vessels approaching Aberdeen Harbour South, the character of Bay of Nigg will have already been altered due to the completion of the harbour and its ongoing activity. The development of an Energy Transition Zone would be in addition to this and increase the change to the current coastal character. Cities are in a constant state of change and the only constant is change. The Aberdeen Bay Wind Farm was a recent addition of considerable scale to the Aberdeen Bay horizon. But it, like the vessels which await births at the existing Aberdeen Harbour, have become part of the city's character. A stated aim of the Proposed Local Development Plan is "*To support the energy transition of the city to zero emissions*" and in time a sympathetically developed Energy Transition Zone could become part of the City's cultural and visual character just like its historic connection to Oil and Gas vessels and infrastructure.

509, 544, 888: It is not disputed that the development of either OP56 or OP61 would result in a visual change to the coastal landscape of Bay of Nigg and its surrounds. The respondents' also set out the multiple aspects of the landscape's character including from the trainline or from the sea. Appendix 2 of the Proposed Local Development Plan states "*Other issues which need to be addressed include water quality, recreational access, habitat connectivity, compensatory planting and landscape buffering with residential areas*". The sites should be considered in their surrounding and currently changing context. OP62 Aberdeen Harbour South is currently under construction. The visual impact of this was considered through the Masterplan for the site. Appendix 2 requires a Masterplan which encompasses OP56, OP61 and OP62 and would again consider the landscape character of the sites.

Traffic Access to Energy Transition Zone and Surrounding Area

102, 119, 359, 533, 626, 1157: The reasoning for the location of the Energy Transition Zone in proximity to the Aberdeen Harbour South has been set out above. Any future development of the sites would require further detailed assessments which would be considered during the masterplanning process or during a planning application assessment. Transport Assessments will be necessary to inform the masterplanning and development management process and determine what mitigation measures would be needed to ensure minimizing the traffic impact of the sites.

The Aberdeen City Region Deal (CDXX) contains a commitment to improving the external transport links to Aberdeen South Harbour. At the time of consultation on the Proposed Local Development Plan the work required to assess preferred options for transport links was ongoing. A Scottish Transport Assessment Guidance (STAG) option appraisal process has recently been completed, and a preferred option approved by the Council's City Growth and Resources Committee (03/02/21) (CDXX). The preferred option A4

involves an upgrade of the existing coast road, replacing the existing rail crossing and accessing Wellington Road via Hareness Road.

The next substantive stage of work will be the design process, but prior to that a Strategic Updated Business Case is required, which will be the document used to access subsequent City Region Deal funding, and provide project assurance to the City Region Deal Board, Scottish Government and United Kingdom Government regarding the arrangements for the design process. The Strategic Updated Business Case will therefore focus both on the case for the investment and preferred option, but importantly, provide a forward plan for the execution of the design process. As such there is still substantial work to be undertaken before a definitive route can be determined. Such consideration for this project would likely be required for any road infrastructure needed to support the Energy Transition Zone.

643: A decision has not been made for the road network in relation to the Energy Transition Zone. As stated above decision have been made for improved connectivity for the Aberdeen Harbour South.

1123: Any studies or business case undertaken to inform the road network for either the Aberdeen Harbour South or the Energy Transition Zone will be required to conform with all requirements such as Scottish Transport Appraisal Guidance (STAG) appraisals. Any final transport schemes will undertake public consultation periods if required and democratic approvals if necessary.

Property Value

533: This is not a consideration for Examination of a Proposed Local Development Plan

Air Quality and Noise Pollution

150, 153, 509, 779, 806, 1099: It is difficult to quantify either the noise generation or potential for air quality issues until a detailed proposal for OP56 and OP61 are presented for consideration. Any future proposals for the development of the site will be subject to detailed assessment through a planning application process. Proposed Local Development Plan Policies WB2 Air Quality and WB3 Noise will apply. A suite of technical supporting documents will be required, and it is likely that noise and air quality assessments will form part of this.

1123: The respondent's point that green spaces provide buffers from emissions is noted. However, the emissions from vessels in Aberdeen Harbour South is outwith the examination of the Proposed Local Development Plan. Consideration of this was undertaken during the assessment of the planning application for the Aberdeen Harbour South (CDXX).

Masterplan

888: The assessment of site constrains is an integral and early part of the masterplanning process. Technical Advice Note Aberdeen Masterplanning Process (CDXX) details the requirements and considerations for the development for a Masterplan. It is therefore unnecessary for the Council to produce a Planning Brief for OP56.

892: There respondent's concerns are noted and issues such as flood risk, site access and connectivity are the express purposes of the masterplanning process.

OP61 - Doonies Farm

68, 77, 81, 161, 162, 163, 164, 181, 183, 184, 185, 187, 194, 197, 198, 0201, 202, 207, 209, 211 213, 215, 216, 217, 219, 220, 221, 222, 223, 225, 228, 237 238, 255, 256, 257, 262, 352, 362, 429, 495, 509, 533, 536, 537, 539, 544, 695, 699, 702, 751, 796, 797, 799, 801, 802, 803, 804, 805, 806, 809, 818, 819, 822, 825, 828, 845, 847, 849, 854, 860, 876, 921, 924, 929, 931, 943, 970, 972, 977, 978, 979, 981, 1008, 1010, 1017, 1102, 1117, 1157, 1161, 1181: The respondents' concerns are noted. As set out in detail above there are both economic and wider environmental considerations which have led the Council to selecting OP61 as an Energy Transition Zone. It is in the long-term economic interests of the City to aid the transition to renewable energy and suitable sites are required in proximity to the Aberdeen South Harbour to facilitate this.

95: It is not within the scope of a Proposed Local Development Plan to consider if Doonies Farm should receive support from the Council.

238, 255, 533, 798, 822, 828, 845, 847, 849, 851, 860, 878, 921, 922, 978, 1183: It is considered that the development of OP61 as a component of the Energy Transition Zone will have wider economic benefits for the City Region than the retention of the current Farm. However, development and delivery of OP61 is unlikely to be immediate and should offer the Farm and its staff time to consider a transition to an alternative location.

536: The submission has been responded to above in relation to loss of green space and natural environment.

796: The respondent's assertion cannot be confirmed and its consideration it outwith the scope of a Local Development Plan Examination.

801, 1181: Comments noted. Core paths were considered as part of the Development Options Assessment (CDXX) of the Energy Transition Zone.

851: Comments are noted. All efforts will be made through subsequent Masterplans and or planning applications to consider accessibility of all forms either through or around OP56 and OP61.

929: As stated in responding to concerns regarding loss of green space, impacts on natural heritage and the cumulative impact of development, the Proposed Local Development Plan must be considered totally and not as isolated sections.

Impact on Tourism

182, 186, 220, 819, 825, 828, 849, 851, 860, 921, 922, 929, 931, 975, 1173: OP61 has been designated as a component site of the Energy Transition Zone. If the site is developed it is likely that this will result in the need to relocate Doonies Farm away from the site. It is possible that it could operate at another location and there would be discussions between those responsible for running the facility and the Council to determine an appropriate period of time for the vacating of the site.

The respondents are concerned that the rezoning of Doonies Farm to Energy Transition Zone will result in the loss of visitor attraction for tourism and impact on the city's landscape.

359: It is asserted that OP61 Doonies is a gateway to the City. The site is located adjacent to an established industrial area and only accessed by road. It is also close to the community of Torry which is one of the oldest communities of Aberdeen and therefore not located on the periphery of the City to be considered as a gateway site.

626: The location for the docking of cruise ships is outwith the control of the Local Development Plan and is a matter for harbour operations.

798: The Greyhope Bay is located at the Torry Battery with a view primarily directed towards Greyhope Bay and Aberdeen Harbour. It is unlikely that, given the distance and topography between the two locations, the Energy Transition Zone would impact on it.

1095, 1099: As stated above the distance, topography and aspect between Greyhope Bay, Torry Battery and the Energy Transition Zone are such that it is unlikely there will be an impact upon them. In relation to Balanagask Golf Course or Nigg Bay Golf Club the operations of these facilities will not be affected by the Energy Transition Zone given they are located outwith the Opportunity Sites.

Wastewater Treatment Plant

729: The Council notes Scottish Water's submission. The Council will continue to work collaboratively with Scottish Water on any future Masterplan for the Energy Transition Zone.

807: The Wasterwater Treatment Plant has been operational during the construction of the Aberdeen Harbour South. As the project is not finalised it is speculation that the Aberdeen Harbour Revision Order (CDXX) has not been fully complied with regarding mitigation surrounding the wasterwater treatment plant.

892: The boundary of OP56 St Fittick's park has been determined by the Council and has not been objected to by Scottish Water. Given the nature of the use designated for OP56 is it considered appropriate to include the Wastewater Treatment Plan within the boundary and inform any future masterplanning or applications accordingly.

Reporter's conclusions:

Reporter's recommendations:

Issue 18	POLICIES WB1, WB2, WB3, WB4, WB5: HEALTH AND WELLBEING	
Development plan reference:	Pages 45 - 48	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Sarah Myers (111) Rodrigo Rendon (710) Stewart Milne Homes (717) Lee McAllister (757) Aberdeen International Airport (788) Cults, Bieldside and Milltimber Community Council (833) Lorcan O'Connor (842) Castlehill and Pittodrie Community Council (843) NHS Grampian (882) Scottish Environment Protection Agency (892) CALA Homes (North) Ltd (900) Association for the Protection of Rural Scotland (1143)</p>		
Provision of the development plan to which the issue relates:	To ensure health and wellbeing is at the forefront of development	
Planning authority's summary of the representation(s):		
<p><u>Policy - WB1 Healthy Developments</u></p> <p>717, 900: The Proposed Local Development Plan is required to be clear and provide certainty. The policy does not provide sufficient information, and there is a lack of clarity in what is expected from development submissions. The Aberdeen Planning Guidance is not available, and without its context the policy cannot be fully considered. Circular 6/2013 Development Planning paragraph 81 notes that information can be contained within Supplementary Guidance, especially if there is no significant change to policy, and appropriate context remains. The policy is not based on robust evidence as expected in Circular 6/2013. The document must be published before the Examination so further comment can be made. The policy is new, with no appropriate context, and relies on a future document with unknown status as the review of the Planning Act has yet to be completed.</p> <p>900: The policy is duplication as aspects of healthy environment are considered through other policies in the Proposed Local Development Plan.</p> <p>900: The policy was not consulted on at the Main Issues Report and it is inappropriate to do so at the Proposed Local Development Plan.</p> <p>900: The requirement for a Health Impact Assessment is another cost to development. The link between the policy and the potential to collect planning obligations is disputed.</p>		

757: Support the emphasis on Health and Wellbeing that runs throughout the Proposed Local Development Plan. Suggests amendments to the policy to make it clearer that new or improved developments that directly help people to live healthier lives will be supported in principle. Specific word changes are not given.

882: Supports the policy.

Policy WB2 – Air Quality

843, 882, 892: Supports policy and actions to improve air quality.

892: Respondent suggests additional wording to Section 5.8.

843: Supports the identification of Air Quality Management Zone: City Centre, and the measures within Aberdeen's Air Quality Action Plan.

1143: Agrees with identification of Air Quality Management Areas to improve air quality. Promotes more street tree planting to improve air quality and amenity.

Policy WB3 – Noise

788, 882: Supports the policy.

111: Policy seeks to provide some control of noise generating developments and exposure to noise; however, wording should be explicit in stating that residential developments will only be supported where an appropriate residential environment can be achieved.

842: Notes that paragraph 5.12 however points out the text does not explicitly refer to environmental noise from patrons on streets. Amend the text to include reference to: "*environmental noise from patrons on the streets, entering/leaving pubs and clubs, and lingering on the street.*" Policy needs to protect residents' rights to live free of antisocial behaviour. Queries whether policy will be used to monitor street noise at night. Seeks clarification as to whether the Bon Accord Residents Association area could in principle be designated as a Noise Monitoring Area for Night Noise.

Policy WB4 - Specialist Care Facilities

833: Paragraph 5.14 of the Proposed Local Development Plan should acknowledge and encourage specialist 'active retirement' developments with continuing care on site as an additional category to residential care and nursing homes.

882: Welcome the policy and the recognition that special needs housing will be supported. However there needs to be continued consideration of broader social care groups (age range, needs, types of provision, those with complex physical and mental health needs) who have wider requirements than the remit of care homes. An obvious need requires to be demonstrated, and engagement with NHS Grampian and Aberdeen City Health and Social Care Partnership to evidence the need for housing for people with disabilities or care homes for the elderly will be necessary. Staffing, complex medical need and unscheduled visits are constraints. NHS Grampian and Aberdeen City Health and Social Care partnership would need more information on the level of care proposed at these Specialist Care Facilities before support can be given and it is requested that Policy WB4

makes reference to “the need to consult NHS Grampian and Aberdeen City Health and Social Care Partnership”.

Policy WB5 - Changing Places Toilets

882: Supports the policy.

General

710: Section 5: Health and Wellbeing is silent on anti-social behaviour.

843: The Public Health Standards of water quality, air quality, hazardous materials, noise levels and all other public health priorities need to remain at European Union level standard, even post the United Kingdom’s withdrawal from the European Union.

Modifications sought by those submitting representations:

Policy WB1 - Healthy Developments

717: The Aberdeen Planning Guidance on Health Impact Assessment must be provided in advance of the Examination.

900: Respondent requests that Policy WB1 Health Development is modified. It is requested that further information is required to assess the suitability of the policy to be included in the Proposed Aberdeen Local Development Plan.

Policy WB2 – Air Quality

892: Amend paragraph 5.8 to read:

“As part of our statutory duties under the UK Environment Act 1995 the Council undertakes monitoring and assessment of seven key pollutants recognised to impact on health. Aberdeen currently exceeds the EU and national annual mean objective for nitrogen dioxide and the annual mean national objectives for particulate matter, resulting in three Air Quality Management Areas (AQMAs) being declared”.

Policy WB3 – Noise

111: Amend policy to include the following sentence between the second and third paragraphs: *“Where residential development is proposed, it will only be supported where an appropriate residential environment can be achieved for existing and future occupiers, including noise, vibration, and lighting.”*

842: Add text to policy: ‘All residents have a right to live peacefully in safe and secure communities.’ Consider amending paragraph 5.12 to read: *“By preventing development in sensitive locations planning authorities can help to prevent and minimise exposure to environmental noise”.* Amend the text to include reference to *“environmental noise from patrons on the streets, entering/leaving pubs, and clubs, and lingering on the street”.*

Policy WB4 - Specialist Care Facilities

833: Paragraph 5.14 of the Proposed Local Development Plan should acknowledge and encourage specialist 'active retirement' developments with continuing care on site as an additional category to residential care and nursing homes.

882: Requests that Policy WB4 makes reference to "*the need to consult NHS Grampian and Aberdeen City Health and Social Care Partnership*".

Summary of responses (including reasons) by planning authority:

Policy WB1 - Healthy Developments

717, 900: Planning Circular 6/2013: Development Planning (CDXX) notes Plans themselves should focus on Vision, the Spatial Strategy, overarching and other key policies and proposals. The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in non-statutory Aberdeen Planning Guidance. However, the Proposed Local Development Plan provides details of some of the issues which will be covered by Aberdeen Planning Guidance underneath the corresponding policy.

Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no locus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public, in the same way that consultation was undertaken on the current Supplementary Guidance. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that stakeholders will be able to comment at the appropriate level of detail. Planning Circular 6/2013: Development Planning (CDXX) outlines the benefit of non-statutory guidance is that it can be updated quickly to take account of any issues which arises during the life cycle of the plan. Although non-statutory guidance will not form part of the Development Plan, when adopted it will be a material consideration in decision making.

900: National Planning Framework 3 (CDXX), Scottish Planning Policy (CDXX) and the Aberdeen City and Aberdeenshire Strategic Development Plan 2020 (CDXX) all highlight the relationship between well-planned places, a healthy lifestyle, wellbeing and social inclusion. At a local level Aberdeen's Local Outcome Improvement Plan 2016-2026 (CDXX) highlights the division in health and life expectancy within Aberdeen. Planning can help to alleviate this gap through ensuring developments are healthy. It stands to reason there is overlap between Proposed Policy WB1 and other policies with the Proposed Local Development Plan. A 'health in all policies' approach was at the forefront of writing the Proposed Local Development Plan.

Proposed Policy WB1 maybe viewed as an overarching policy, with further detail on specific aspects found in other policies. The overlap does not distract from the detail or importance of other policies, as each policy may have a distinct focus, for example active travel is specifically noted in Proposed Policy T2: Sustainable Transport as a measure to minimise vehicular traffic generation and in Proposed Policy NE2: Outdoor Access and Core Paths active travel is linked to the provision of new or improved access. Yet active travel is also of benefit to physical health, social connections, mental wellbeing, it ensures

good connectivity and accessibility, helps create successful places, and will support a reduction in Aberdeen's carbon footprint thereby tackling climate change.

900: The Main Issues Report 2019 (CDXX) did not overtly discuss health and wellbeing. We were aware of the reconnection between planning and public health and wellbeing through the development of the Planning (Scotland) Act 2019 (CDXX). When the Planning (Scotland) Act 2019 received Royal Assent in July 2019, a corporate level decision was made to ensure the Local Outcome Improvement Plan 2016-2026 and the Proposed Local Development Plan were aligned so 'on the ground' objectives could be achieved. The decision to include the policy within the Proposed Local Development Plan was to ensure an overarching approach was taken to health and wellbeing. As is noted above, aspects of health and wellbeing are considered through other policies within the Proposed Local Development Plan, many of which are rollovers of existing policies within the extant Local Development Plan 2017 (CDXX); however this policy pulls together the distinct focus of many of these policies to ensure health and wellbeing is considered in a holistic and overt manner. It is not felt the WB1 health and wellbeing policy will add further pressures to developers, rather it is asking for the health and wellbeing aspects of developments to be considered in the round within the development proposals. Developer Obligations will be met through Proposed Policy I1: Infrastructure Delivery and Planning Obligations, where there is a well-practiced mechanism for identifying such funds which can assist with positive health and wellbeing, for example for Core Paths, open space provision, sports and recreation, and healthcare. The roots of planning are tied intrinsically to health and wellbeing through improving or making more equal social capital, it was deemed to be acceptable to make these connections clear. The reconnection of planning and public health and wellbeing has been emphasized at a national level through the Planning Scotland (Act) 2019 (CDXX) and will form a fundamental part of National Planning Framework 4 when it is published. In the context of COVID-19 this reconnection has become even more important.

757: The purpose of the Proposed Policy is to support and ensure people can choose to live healthier lives, therefore it is not considered to be necessary to state "*developments that directly help people to live healthier lives will be supported in principle.*"

757, 882: The support for the policy is noted and welcomed.

Policy WB2- Air Quality

843, 882, 892: Support to policy, Air Quality Management Zone and Air Quality Action Plan is welcomed and noted.

892: In accordance with Scottish Government's Programme for Government, Aberdeen City Council is working towards the development and implementation of a Low Emission Zone to improve air quality in the City Centre where nitrogen dioxide levels currently exceed national air quality objectives. Public and stakeholder engagement on eight Low Emission Zone options (CDXX) was undertaken in September 2020. Results from the engagement exercise together with traffic and air quality modelling are currently being analysed by Aberdeen City Council's Transport Strategy team to help determine the most suitable Low Emission Zone option for Aberdeen.

There is a request to amend the text in paragraph 5.8. Annual monitoring of air quality is undertaken in accordance with national guidance. Data from the 2020 Air Quality Annual

Progress Report (CDXX) highlights that there were no exceedances of the annual mean PM₁₀ objectives in 2019. It is noted that the Proposed Local Development Plan was prepared before the publication of the Air Quality Annual Progress Report 2020. Changes to paragraph 5.8 of the Proposed Local Development Plan are therefore considered to be unwarranted.

1143: Agreement is welcomed and noted. The Proposed Local Development Plan recognises the important that tree planting has on air quality and amenity, most notably in paragraphs 6.41 – 6.43 of Section 6 - Protecting and Enhancing the Natural Environment and paragraph 7.6 of Section 7 – Quality Placemaking.

Policy WB3 – Noise

788, 882: Support is welcomed and noted.

111, 842: Proposed Policy WB3 was prepared with Planning Advice Note 1/2011: Planning and Noise (CDXX) as a guide and is considered to be in alignment with national advice. The Proposed Policy makes clear that housing and other noise sensitive development will not be permitted next to noisy land uses without suitable mitigation measures. The Proposed Local Development Plan recognises the importance of amenity for residential development and follows a design-led placemaking policy approach. This is reflected in Proposed Policies D1: Quality Placemaking and D2: Amenity. All development has to adhere to placemaking principles and any applications for residential development will be assessed on their own merits and against Proposed Policies D1: Quality Placemaking and D2: Amenity, the six qualities of successful placemaking mentioned in paragraph 7.5 and any additional relevant policies. Changes to Proposed Policy WB3 are therefore considered to be unwarranted.

Paragraph 5.12 of the Proposed Local Development Plan currently refers to leisure activities such as attending night clubs and pubs as part of environmental noise.

Policy WB4 - Specialist Care Facilities

833: The list of developments noted in paragraph 5.14 of the Proposed Local Development Plan is not proposed to be exhaustive. The definition “active retirement” is not recognised with The Town and Country Planning (Use Classes) (Scotland) Order 1997 and does not appear to be industry standard terminology. Research on active retirement suggests it is “*the practice of engaging in quality activities during a person’s retirement that make life worthwhile*”. Paragraph 9.10 of the Proposed Local Development Plan provides further information on this topic and changes to paragraph 5.14 of the Proposed Local Development Plan are therefore considered to be unwarranted.

882: The support for the Proposed Policy is noted and welcomed. Paragraph 9.10 of the Proposed Local Development Plan (noted below) provides further information on this topic, including the acceptance that specialist housing may be required for those that do not fall into the ‘older people’ category:

“It is therefore important that we encourage suitable housing choice for the local population in order to help facilitate independent, affordable living. This may be achieved by adaptable design of homes, or by targeted development such as:

- *Age-restricted general market housing; also known as 'over-55s living' which is exclusive to residents of a minimum age, and generally does not include care provision but may include shared amenities, such as amenity space.*
- *Retirement or sheltered housing; purpose-built accommodation that may include support to enable independent living, with shared on-site amenities.*
- *Extra care housing or retirement communities; purpose-built accommodation with a higher level of care available and extensive shared amenities. This allows residents to benefit from varying levels of care as time progresses.*
- *Residential care homes or nursing homes; accommodation that provides a high level of care for those unable to live independently. See Policy WB4: Specialist Care Facilities.*

These are just some of the common examples of how housing for the older population can be delivered and is not a definitive list. Specialist housing may also be required for those that do not fall into the 'older people' category."

The need to consult with consult NHS Grampian and Aberdeen City Health and Social Care Partnership would appear to relate to issues surrounding staffing, medical need and competing time constraints on staff time. The planning system has no remit over the staffing of services or facilities, be these in private or public ownership. In terms of impact on health facilities, the planning system in Aberdeen City can address this in terms of provision of developer obligations for infrastructure requirements. These have been calculated with NHS Grampian on the basis of national health standards and by estimating the likely number of new patients generated by proposed development. These contributions are calculated using nationally recognised space standards and build costs, based upon the population requirements for GP surgeries, dental chairs and community pharmacies. Changes to Policy WB4 are therefore considered to be unwarranted as the planning system has no remit in staffing. Please see Issue 34: Developer Obligations for further information in developer obligations.

Policy WB5 - Changing Places Toilets

882: The support for the Proposed Policy is noted and welcomed.

General

710: Anti-social behaviour falls within the remit of the Antisocial Behaviour Investigation Team who have the power to enforcement action depends on the circumstances. The Scottish Parliament has introduced the Antisocial Behaviour etc. (Scotland) Act 2004 (CDXX) to allow agencies to stand up to the minority whose behaviour causes serious nuisance in communities. Although not directly legislated by the planning system, Planning Advice Note 77: Designed Safer Places (CDXX) provides advice on how planning can help to create attractive well-managed environments which help to discourage antisocial and criminal behaviour and is a material consideration in the determination of planning applications. The Proposed Local Development Plan recognises the importance of amenity for residential development and follows a design-led placemaking policy approach as is outlined through Proposed Policies D1: Quality Placemaking, D2: Amenity, the six qualities of successful placemaking and WB3: Noise.

843: The Proposed Local Development Plan has no remit to legislate at a national level. Furthermore, public health standards on water quality, air quality, hazardous materials, noise levels and all other public health priorities are not within the remit of the development plan and fall to a number of different legislation processes and organisation. The United Kingdom's Withdrawal from the European Union (Continuity) (Scotland) Act 2021 (CDXX) received Royal Assent on 29th January 2021, and focusses on environmental protection, animal health and welfare, plant health, equality, non-discrimination and human rights, and social protection. The secondary legislation on this has yet to be enacted.

Reporter's conclusions:

Reporter's recommendations:

Issue 19	POLICY NE1: GREEN BELT	
Development plan reference:	Pages 49 - 50, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>David Nance (754) Scottish Hydro Electric Transmission plc (768) Harry McNab on behalf of W and M Donald (844) Opportunity North East (887) NatureScot (888) Barratt North Scotland (891) Homes for Scotland (897) CALA Homes (North) ltd (900) Aberdeen Harbour Board (910) Association for the Protection of Rural Scotland (APRS) (1143)</p>		
Provision of the development plan to which the issue relates:	To safeguard the Green Belt and set out provisions for acceptable development.	
Planning authority's summary of the representation(s):		
<p><u>Support for Policy</u></p> <p>754: Supports Policy NE1 Green Belt. Happy to see the removal of the requirement for an existing house to have been in continuous occupation for at least five of the seven years immediately prior to the date of application for a replacement house.</p> <p>768: Supports the inclusion of 'electricity grid infrastructure' as an exception within Policy NE1 Green Belt.</p> <p><u>Brownfield Sites in the Green Belt</u></p> <p>844: Clarity sought regarding refurbishment of vacant brownfield sites within the Green Belt.</p> <p>891: Regeneration and redevelopment of brownfield sites should also be acceptable and encouraged within the Green Belt. Note that Policy NE1 contains some provision for this within criteria G, H and I - but consider that these are very narrow in their scope, effectively only allowing replacement housing on a one for one basis or conversion / change of use of an existing historic building. Respondent requests that this scope is broadened to include redundant brownfield sites.</p> <p>897: Additional exceptions should be added to Policy NE1 Green Belt as this would better align with paragraph 30 of Scottish Planning Policy.</p> <p><u>Quarry and Mineral Restoration</u></p>		

888: Suggests word changes to Policy NE1: Green Belt. The policy says that "*Development in areas defined as Green Belt on the Proposals Map will not be supported. Exceptions to this general presumption will only be supported where the proposal: ...c) is for the extraction of minerals or quarry restoration...*" Respondent notes that the green belt does include two operational quarry areas (OP44 and OP55) and suggests that the exception at point 'c' of the policy could be reworded to make clearer that it will apply to extraction of minerals that meets an established need, if no other suitable site is available. Respondent advises the Council to consider whether this suggested change would unreasonably restrict extraction (or possible expansion) at OP44 and OP55.

Aberdeen Western Peripheral Route

891: The Green Belt designation has undergone significant change because of the completion and opening of the Aberdeen Western Peripheral Route. In many areas, the Green Belt designations will no longer serve the same purpose as they did prior to the presence of the Aberdeen Western Peripheral Route, as it now acts as a physical barrier, preventing any potential for coalescence. The Council has resisted any allocations or development in close proximity to the Aberdeen Western Peripheral Route junctions. However, during the recent Examination of the Aberdeen City and Shire Strategic Development Plan 2020, the Reporter acknowledged that the Aberdeen Western Peripheral Route junctions have the potential to be one of the most accessible locations in Aberdeen and Aberdeenshire, and that the Proposed Strategic Development Plan does not absolutely rule out development at junctions, but rather requires a proper assessment of impacts on the junction and route. Therefore requests that the Green Belt designation is removed in the areas immediately surrounding the major junctions at Milltimber, Westhill and Aberdeen Airport, similar to the area around the major grade separated junction at Charleston to the south of Cove. Consider that this would remove the presumption against development around these junctions, and therefore allow proposals to come forward with any associated impacts assessed on their own merits.

Expansion of Policy

887, 910: Policy should be expanded to allow for expansion of the South Harbour.

Green Belt Review

900: There has been no review of the Green Belt boundaries in support of the Proposed Local Development Plan.

Landscapes

1143: Greater weight in decision-making should be given to the protection of high quality and sensitive environments/landscapes. This is applying the 'precautionary' principle, a key component of sustainability.

Modifications sought by those submitting representations:

Brownfield Sites in the Green Belt

844: Paragraph 1 should make it clear 'existing activities' or uses in the Green Belt include established brownfield sites. Paragraph 3 should include the tidying up of derelict 'brownfield' land within the Green Belt as an additional exception which would

improve its visual character. Paragraph 4 could include clarification that 'existing buildings' include derelict buildings. Paragraph 5 should refer to the allowable replacement (on a one for one basis) of existing house sites, rather than only existing houses currently in occupation.

891: Policy should be modified to include provision for a further criterion, whereby new development would be acceptable in this location. This should allow for the sensitive remediation and redevelopment of redundant buildings and brownfield sites within the Green Belt.

897: Modify to include an additional exemption as follows "*Sensitive redevelopment of buildings which are no longer in use or derelict*".

Quarry and Mineral Restoration

888: Suggests amending exception "c" in the policy to read "*c) is for the extraction of minerals that meets an established need, if no other suitable site is available, or quarry restoration.*"

Aberdeen Western Peripheral Route

891: Policy (plus illustrative designations on the City Wide Proposal Map) would benefit from wider review in recognition of the presence of the Aberdeen Western Peripheral Route, with a view to removing Green Belt designation around its major junctions.

Expansion of Policy

887, 910: Add the following exception to the policy: "*j) the land is identified on the proposals map as safeguarded land and it has been demonstrated that it is likely to be required in support of the growth of South Harbour to provide energy transition and port-centric manufacturing and logistics. Policy NE1 will continue to apply until it has been demonstrated that it is necessary to support the growth of South Harbour.*"

Green Belt Review

900: The respondent requests that Policy NE1 Green Belt be modified to include a review of the Green Belt. The review should consider the development of the Aberdeen Western Peripheral Route and the build out of existing allocations, should be undertaken to inform the appropriateness of the Green Belt boundaries and the most suitable locations for new development.

Summary of responses (including reasons) by planning authority:

Support for Policy

754, 768: Support for Proposed Policy NE1 is noted and welcomed.

Brownfield Sites in the Green Belt

844, 891, 897: The Council is of the opinion that respondent 844 is making comments on the extant Green Belt policy from the Local Development Plan 2017. The Council are satisfied that Proposed Policy NE1: Green Belt is consistent with paragraph 30 and 52 of Scottish Planning Policy (CDXX) and all other relevant sections of the document. The Proposed Policy is worded to primarily protect and safeguard the areas identified as Green Belt by resisting development. This allows for the protection of the distinct identity of Aberdeen, and the communities within and around the city, by defining their physical boundaries clearly. The Proposed Policy allows for development to take place within the Green Belt on an exceptional basis. This is to avoid coalescence of settlements and sprawling development on the edge of the City. It would not be appropriate to add an additional criterion specifically for brownfield land as this would undermine the objectives of the Green Belt policy and would be contrary to paragraph 52 of Scottish Planning Policy (CDXX). The policy already allows for the sensitive redevelopment of redundant buildings and brownfield sites as long as they fit the scope of the criteria listed.

Quarry and Mineral Restoration

888: The Council's view is that the current wording of Proposed Policy NE1 exception c which states "*is for the extraction of minerals or quarry restoration*" is sufficient. Scottish Planning Policy (CDX) discusses this issue at paragraph 52 and advises that Local Development Plans should describe the types and scales of development which would be appropriate within a Green Belt, one of which may include, "*development meeting a national requirement or established need, if no other suitable site is available*". It is not necessary for the Plan to repeat this precise wording in policy as this has already been discussed and established at a National level. Furthermore, given that a new planning system is emerging from the Planning (Scotland) Act 2019 (CD XX) it is possible there will be a revised version of Scottish Planning Policy to inform the new policy context.

Aberdeen Western Peripheral Route

891: The Aberdeen Western Peripheral Route is a key component of the national Strategic Network that is rightfully covered by regional policies through the Aberdeen City and Shire Strategic Development Plan 2020 (CDX) and Regional Transport Strategy (CDX). The Aberdeen City and Shire Strategic Development Plan 2020 paragraph 3.14 discusses the Aberdeen Western Peripheral Route in relation to the strategic growth of Aberdeen City. It clearly sets out the importance of 'locking in' the benefits of the road and specifically states, "*that the capacity of the route, and its junctions, is not negatively affected by development. Local Development Plans, in line with the sequential test and Town Centre First Principle, should expressly avoid any new development that would result in a negative impact on the route or any junction. Any new development adjacent to the Aberdeen Western Peripheral Route, including the Fastlink to Stonehaven, will be resisted unless it has been properly considered through the Development Plan process, and any proposals which are not identified by a Local Development Plan will generally not be supported*".

Paragraph 11.93 of the Regional Transport Strategy (CDXX) discusses the importance of the 'locking in the benefits' work, "*In recent years, there has been substantial investment in additional capacity on the road network, with the Aberdeen Western Peripheral Route, Diamond Bridge and other enhancements. However, it has always been believed that*

such investment needed to be complemented by measures to improve walking, cycling and public transport networks to effectively “Lock in the Benefits” and ensure that road investments did not just result in increased traffic demand as part of a vicious cycle. There is potential to manage traffic demand, particularly in urban areas (including and especially dual carriageways) to redetermine the space given to cars relative to the stated hierarchy of Walk/Cycle/Public Transport/Cars. Active Travel and public transport should be encouraged by ensuring their needs are prioritised over general traffic, in line with the National Transport Strategy and its Transport Hierarchy.” The importance of prioritising non-vehicular modes of transport are clearly highlighted.

The Proposed Local Development Plan places significant importance on the promotion of citizens' health and wellbeing as discussed in detail in Section 5. Proposed Policies WB1 and WB2 in particular focus on the promotion of healthy developments and improving air quality. The Council would not promote the development of new communities adjacent to the Aberdeen Western Peripheral Route for these reasons, in fact one of the major benefits of the Aberdeen Western Peripheral Route is that it removes heavy vehicle movements from densely populated areas of Aberdeen which is discussed in paragraph 6.6 of the Locking in the Benefits of the Aberdeen Western Peripheral Route Final Report 2012 (CDXX).

Expansion of Policy

887, 910: It is the Council's view that it is not appropriate or necessary to add an additional criterion to Proposed Policy NE1 in order to allow for the expansion of the South Harbour for energy transition, port-centric manufacturing and logistics. Proposed Policy B5: Energy Transition Zones clearly sets out what would be deemed acceptable in terms of developing land in this area for energy transition purposes. All other applications for harbour related development in the Green Belt would be assessed against criteria a-f and other relevant policies. The existing Green Belt designation around the South Harbour area is also predominantly covered by the Undeveloped Coastal Management Area designation (shown on the Additional City Wide Proposals Map (Constraints Map) and protected under Proposed Policy NE4 – Our Water Environment) where there is a presumption against development in order to protect the largely unspoilt nature of the coastline.

Green Belt Review

900: Scottish Planning Policy (CDXX) does not require planning authorities to review Green Belt boundaries during the preparation of a Local Development Plan. The planning authority can choose to carry one out if it is considered necessary. As the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) did not call for significant new releases of Green Belt land for development, the Council did not view that a significant review of Green Belt boundaries was required during the preparation of the Proposed Local Development Plan.

Landscapes

1143: It is the Council's view that the Proposed Local Development Plan already gives sufficient weight to the importance of protecting sensitive landscapes and environments. This weight and importance runs throughout the entire Proposed Local Development Plan but is particularly emphasised through Proposed Policies NE1-5, D4 and D5. An

Environmental Report (CDXX) has been prepared as a supporting document to the Proposed Local Development Plan. This document comprises a Strategic Environmental Assessment and a Habitats Regulations Appraisal, both of which apply the precautionary principle.

Reporter's conclusions:

Reporter's recommendations:

Issue 20	POLICY NE2: GREEN AND BLUE INFRASTRUCTURE	
Development plan reference:	Pages 50 - 53, City Wide Proposals Map, Additional City Wide Proposals Map (Constraints Map)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr Robert Black (18) Stewart Milne Homes (717) sportsotland (746) Castlehill and Pittodrie Community Council (843) NHS Grampian (882) Scottish Government (885) Opportunity North East (887) Barratt North Scotland (891) Scottish Environment Protection Agency (892) CALA Homes (North) Ltd (900) Aberdeen Harbour Board (910) Pippa Roberston (1110) Association for the Protection of Rural Scotland (APRS) (1143).</p>		
Provision of the development plan to which the issue relates:	Provides protection for green space and ensures green and blue infrastructure are incorporated in new development.	
Planning authority's summary of the representation(s):		
<p><u>Support for Policy</u></p> <p>746, 843, 882, 1143: Supportive of Policy NE2.</p> <p>891: With regard to Policy NE2 (Open Space in New Development), the respondent generally welcomes the removal of the Aberdeen Local Development Plan 2017 requirement to provide at least 2.8 hectares per 1,000 people of meaningful and useful open space in new residential development.</p> <p><u>Council Land as Orchards</u></p> <p>18: Suggests that the Council utilise amenity and green spaces as orchards to produce apples, blackberries and honey. Doing this could not only make the Council money but also provide jobs for the unemployed, improve social cohesion, provide environmental benefits and further the Council's climate change mitigation agenda.</p> <p><u>Food Growing Strategy</u></p> <p>1143: Support opportunity for food growing in cities. Makes comments on paragraphs 6.18-6.20 of the Proposed Local Development Plan. Strategy should be extended for stronger protection of prime agricultural land in the countryside around the city.</p> <p><u>Aberdeen Planning Guidance</u></p>		

717: The Proposed Local Development Plan is required to be clear and provide certainty. The Aberdeen Planning Guidance is not available. It is not possible to comment on the policy. The document must be published before the examination so further comment can be made. Circular 6/2013 Development Planning paragraph 81 notes information can be contained within Supplementary Guidance, especially if there is no significant change, and appropriate context remains. The policy relies on a future document with unknown status.

746: It is presumed that the Open Space Aberdeen Planning Guidance will be produced at a later date as no existing guidance matches this title. Welcome opportunity to review future guidance that may have implications on spaces for sport - this would also include future iterations of the Open Space Audit and Strategy referred to in the proposed Local Development Plan.

900: Refers to Policy NE2 and how it had been amended from the version in the extant Local Development Plan 2017 to remove the stated standard for provision of open space and the introduction of a specific requirement for food growing spaces. States that further guidance is to be provided by non-statutory guidance which is not subject to a formal adoption process. There is less clarity in what is required from developments for developers and the public in policy and without scrutiny of the detail of guidance this could introduce policy requirements that are not deliverable.

1143: Helpful if guidance could offer indicative amounts of open space for different types of development.

1143: Seeks guidance and greater inclusion of wildlife crossings/passages across infrastructure.

Clarity Sought

746: It is not clear from use of the word 'equivalent' if this includes existing use of the green space. It could be interpreted that it relates to size of the space only. It is important that any compensatory green space provision replaces the use lost to protect amenity of users. Example is given where a food growing space can not be used for a game of football so the loss of pitch cannot be compensated for by new allotments as any existing sporting users could no longer access the particular green space that meets their needs.

1143: Queries definition of term 'wheeling'

Sensory Experiences

843: Sensory experiences in our green spaces should be a priority, as they have positive health impacts for people with physical and neurological conditions.

Outdoor Sport Facilities

885: Page 52 of the Proposed Local Development Plan and Policy NE2 Green and Blue Infrastructure should make reference to Outdoor Sports Facilities which would bring the Proposed Local Development Plan in line with paragraph 266 of Scottish Planning Policy and Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. Policy NE2 does not fully set out the particular exceptions set out in

paragraph 226 of Scottish Planning Policy in relation to safeguarding outdoor sports facilities.

Expansion of Policy

887: Respondent considers how land around the harbour is limited in its availability. Given the current economic imperative for growth and the energy transition the respondent sets out that finer details of future development would be considered through subsequent planning applications and in issues such as environmental considerations, the landscape character of the area through mechanisms such as an Environmental Impact Assessment. Refers to the Energy Coast concept and that any future Masterplan for the Harbour and Energy Transition Zone should incorporate this. The respondent acknowledges the importance of Policy NE2 seeking “*to protect, support and enhance the Green Space Network*” but argues that given the limited land available around the harbour and the Energy Transition Zone that there should be exceptions to this requirement. The policy should confirm where such exceptions could occur such as for National Developments. With regards to Urban Green Spaces as contained in Policy NE2 there is a presumption against the loss of urban spaces with limited exceptions. The respondent does not dispute the value of these spaces however is considers that further exceptions should be defined within the policy and that the Energy Transition Zone should be considered one of these given its importance in terms of aiding a transition to net zero, economic reasons and being a candidate national project.

910: Further exceptions should be added to the Policy relating to protecting the economic opportunity. Further exception required to policy as due to limited land supply it may not be possible to provide alternative green space within the locality.

1110: Policy should be revised so that all forms of local food and community growing spaces are expressly referred to in the definition of urban green spaces that are to be protected from re-development, including (but not necessarily limited to) community gardens and woodlands, city farms, orchards, and roof gardens, as well as allotments.

Also policy should be revised to include an express requirement for food or other community growing spaces to be provided as part of all new development, with various ways in which this could be done depending on the type of development involved.

A new policy should be introduced into the Local Development Plan which expressly supports proposals for the creation of new allotments and other food and community growing projects, as well as the infrastructure required to support these.

Aberdeen Western Peripheral Route

891: Note that the Green Space Network designation has undergone significant change as a result of the completion and opening the Aberdeen Western Peripheral Route. Consider that, in many areas, the Green Belt designations will no longer serve the same purpose as they did prior to the presence of the Aberdeen Western Peripheral Route, as it now acts as a physical barrier, preventing any potential for coalescence. Note that the Council has resisted any allocations or development in close proximity to the Aberdeen Western Peripheral Route junctions. However, during the recent Examination of the Aberdeen City and Shire Strategic Development Plan 2020, the Reporter acknowledged that the Aberdeen Western Peripheral Route junctions have the potential to be one of the most accessible locations in Aberdeen and Aberdeenshire, and that the Strategic Development

Plan does not absolutely rule out development at junctions, but rather requires a proper assessment of impacts on the junction and route. In this context the respondent requests that the Green Space Network designation is removed in the areas immediately surrounding the major junctions at Milltimber, Westhill and Aberdeen Airport, similar to the area around the major grade separated junction at Charleston to the south of Cove. Consider that this would remove the presumption against development around these junctions, and therefore allow proposals to come forward with any associated impacts assessed on their own merits.

Blue Infrastructure

892: The policy should explicitly refer to Blue Infrastructure and offers amended text.

Core Paths

1143: Core Paths are generally multi use and conflicts can occur between different users. Believe a code of 'behaviour' should be promoted to minimise such conflicts.

Modifications sought by those submitting representations:

Aberdeen Planning Guidance

717: The Aberdeen Planning Guidance is not available. It is not possible to comment on the policy. The document must be published before the examination so further comment can be made.

900: The respondent requests that Policy NE2 Green and Blue Infrastructure be modified as it cannot be adopted in its current form without further detail provided on the expectations of developers in the provision of open space and an assessment of its impact on the wider Aberdeen Local Development Plan objectives and policies.

Clarity Sought

746: Clarification on the meaning of 'equivalent' in this context and whether this includes the particular use of the green space.

Outdoor Sport Facilities

885: It is requested that the term 'outdoor sports facilities' be inserted into the bracketed section in the first sentence of the Urban Green Space section (Page 52 Policy NE2).

Policy NE2 to be amended to reflect exceptions set out in paragraph 226 of Scottish Planning Policy, in particular points around a proposed development being ancillary to the principle use of the site for sports and around consultation with Sport Scotland.

Expansion of Policy

887, 910: Requests modifications to Policy NE2 Green and Blue Infrastructure so it reads as follows, "*Development proposals will seek to protect, support and enhance the Green Space Network (identified on the Proposals Map). This broadly encompasses the wildlife, biodiversity, ecosystem services and functions, access, recreation, landscape and*

townscape value of the Green Space Network. Development that does not achieve this will not be supported except in exceptional circumstances where it is demonstrated that there are no alternative sites for the development and there is an overriding economic imperative of regional or national importance. Such exceptions will be considered on the individual merit of the proposed development."

Also amend Urban Green Spaces text to read, "*Exceptions may be made when an equivalent and equally convenient and accessible area for public space is provided by the applicant for Urban Green Space purposes...in the locality, or where there is an overriding economic imperative of regional or national importance which will be considered on the individual merit of the proposed development."*

Aberdeen Western Peripheral Route

891: Policy (plus illustrative designations on the City Wide Proposal Map) would benefit from wider review in recognition of the presence of the Aberdeen Western Peripheral Route, with a view to removing Green Space Network designation around its major junctions.

Blue Infrastructure

892: Amend Policy NE2 to read:

"Development proposals must demonstrate how they protect, support and enhance the Green Space Network (identified on the Proposals Map). Aberdeen's Green Space Network is a strategic city-wide network that connects natural green and blue spaces and habitats to each other and the communities around them. It is made up of multiple components of 'green infrastructure'. The city's 'blue features' are also included within this Network. This broadly encompasses the wildlife, biodiversity, ecosystem services and functions, access, recreation, landscape and townscape value of the Green Space Network. Development that does not achieve this will not be supported".

Summary of responses (including reasons) by planning authority:

Support for Policy

746, 843, 882, 891, 1143: Support for Proposed Policy is noted and welcomed.

Council Land as Orchards

18: It is recognised and agreed that community food-growing is an important activity on the pathway to increased sustainability delivering a range of co-benefits to health and wellbeing, access to food and biodiversity. Granite City Growing (CDXX), Aberdeen's food-growing strategy, was approved in February 2020. It includes the Vision that "*everyone who wants to has access to food-growing opportunities*" (CDXX, page XX). The strategy covers all forms of community growing, where growing activities are collective and voluntary or expressly for community benefit and includes community orchards and foraging opportunities within its scope. It does not however include food-growing for a profit as this was scoped out by stakeholders at an early stage of its development. The ambition of Granite City Growing has been taken forward into this Proposed Local

Development Plan and will be carried forward into associated Aberdeen Planning Guidance.

Food Growing Strategy

1143: The scope of the food-growing strategy, Granite City Growing (CDXX), is for community growing which aligns to the spirit of the Community Empowerment (Scotland) Act from which it came. It therefore does not look at commercial food-growing nor larger scale agriculture. It is intended that the Open Space Aberdeen Planning Guidance will give further details regarding food growing and open space provision. The Council agree that food production will need to be a central part of both the climate mitigation and adaptation actions needed over the coming years and significant work has already been undertaken to look at this issue. The Council's Climate Adaptation Framework 'Aberdeen Adapts' (CDXX) discusses wider food security issues in detail. Sustainable food growing does not necessarily require prime agricultural land in order to take place, however the majority of agricultural land within the city boundary is designated as Green Belt (Proposed Policy NE1) and would therefore be protected under those policy principles.

Aberdeen Planning Guidance

717, 746, 900: The level of detail in Proposed Policy NE2 is appropriate. More detailed policy aspects will be contained in Aberdeen Planning Guidance. Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination, and Reporters have no locus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public, in the same way that consultation was undertaken on the current Supplementary Guidance. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that all stakeholders will be able to comment at the appropriate level of policy detail at the appropriate time. Having the open space standards in Aberdeen Planning Guidance rather than within the Proposed Local Development Plan itself allows the Council the flexibility to amend and re-consult on this issue if necessary, for instance following the publication of revised versions of the Council's Open Space Audit and Strategy (current versions CD XX and CD XX) which are expected to be finalised and published late 2021 (Audit) and 2022 (Strategy).

1143: The Aberdeen Planning Guidance 'Open Space and Green Infrastructure' which will be developed to support Proposed Policy NE2 will include relevant information regarding appropriate wildlife crossings within new development. It will also discuss appropriate amounts of open space for different types of development.

Clarity Sought

746: Proposed Policy NE 2 - Urban Green Space states, "*Exceptions may be made when an equivalent and equally convenient and accessible area for public space is provided by the applicant for Urban Green Space purposes...*" The respondent is correct that the policy does not specify exactly what is meant by "equivalent". This is purposeful and allows for flexibility in the application of the policy. It will not always be appropriate to replace a lost urban green space with an exact replica (in size, function and characteristic) somewhere else within the vicinity. For instance, within a community where there is clear excess of provision of sport pitches it may in some circumstances be appropriate for a poorer quality sport pitch to be replaced elsewhere within the area by a

different use, if that other use better served the overall community (if this was agreed following consultation with sportscotland). It is the intention that this would be considered on a case by case basis and it is for the determining Officer to decide whether what is being offered as a replacement is suitable in terms of value and function at the time of decision making.

1143: The term '*wheeling*' is listed in the Glossary of the Proposed Local Development Plan (page XX) and is defined as: "*Refers to travelling by wheelchair.*"

Sensory Experiences

843: The Council agree that the sensory experience of green and open spaces is very important for mental and physical wellbeing. Specific requirements such as height of benches, type and scent of flowers would be detail beyond which the plan would specify however these matters may be dealt with at the Masterplanning stage of site development.

Outdoor Sport Facilities

885: The Council agree that adding the term 'outdoor sport facilities' into the bracketed section in the first sentence of the Urban Green Space section of Proposed Policy NE2 would make it clearer that these other sport facilities are also protected by this policy. If the Reporter is so minded the Council could make this suggested word change.

The respondent has also requested for the Proposed Policy to be amended to reflect the exceptions set out in paragraph 226 of Scottish Planning Policy (CDX), in particular points around a proposed development being ancillary to the principle use of the site for sports and also around consultation with sportscotland. It is the Council's view that it is not necessary to repeat precisely what is listed in Scottish Planning Policy (CDX) within Proposed Policy NE2 as this is already the agreed policy position. This suggested amendment could also cause confusion as the 'Urban Green Space' section is not only about sports provision. The level of detail that the respondent describes is better suited within Aberdeen Planning Guidance: Open Space and Green Infrastructure.

Expansion of Policy

887, 910: It is the Council's view that it is not appropriate to amend Proposed Policy NE2 as suggested by respondents 887 and 910. The Council's position is as stated in the Policy, "*Development proposals will seek to protect, support and enhance the Green Space Network... Development that does not achieve this will not be supported.*" Having a robust and rigorous policy surrounding the protection and enhancement of Green and Blue Spaces is required in order to convey the importance that these areas have. Green and Blue infrastructure is "*an essential part of our long-term environmental performance and climate resilience*" (Scottish Planning Policy CDXX, paragraph XX). The current wording of Proposed Policy NE2 reflects the principles of Scottish Planning Policy, particularly paragraphs 219 to 225.

1110: It is the Council's view that it is not necessary to revise Proposed Policy NE2 to expressly refer to all forms of local food and community growing spaces in the definition of urban green spaces that are to be protected from re-development nor for there to be an express requirement for food or other community growing spaces to be provided as part of all new development as requested by respondent 1110. Paragraph 6.20 of the Proposed

Aberdeen Local Development Plan states, “...*this Plan supports opportunities for food-growing projects in the city. This can be achieved through the protection and enhancement of existing open spaces identified on the Proposals Map. Specific areas with food-growing potential will be identified by the Food Growing Strategy using the Open Space Audit. It can also be achieved through meaningful open space provision in new developments. This is included within Proposed Policy NE2, and further guidance on food-growing is included in the Aberdeen Planning Guidance ‘Open Space and Green Infrastructure’.*” As stated within this paragraph, further guidance on this matter will be included in future Aberdeen Planning Guidance.

Likewise, the Council do not feel it is necessary to have a new and separate policy on supporting proposals for the creation of new allotments and other food and community growing projects. Proposals of this nature would be considered against Proposed Policy NE2 and all other relevant policies contained within the Plan.

Aberdeen Western Peripheral Route

891: The Aberdeen Western Peripheral Route is a regional transport route that is rightfully covered by regional policies through the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and Regional Transport Strategy (CDXX). The Aberdeen City and Shire Strategic Development Plan 2020 at paragraph 3.14 discusses the Aberdeen Western Peripheral Route in relation to the strategic growth of Aberdeen City. It clearly sets out the importance of ‘locking in’ the benefits of the road and specifically states, “*that the capacity of the route, and its junctions, is not negatively affected by development. Local Development Plans, in line with the sequential test and Town Centre First Principle, should expressly avoid any new development that would result in a negative impact on the route or any junction. Any new development adjacent to the Aberdeen Western Peripheral Route, including the Fastlink to Stonehaven, will be resisted unless it has been properly considered through the Development Plan process, and any proposals which are not identified by a Local Development Plan will generally not be supported*”. The Proposed Local Development Plan places significant importance on the promotion of citizens health and wellbeing as discussed in detail in Section 5, Proposed Policies WB1 and WB2 in particular focus on the promotion of healthy developments and improving air quality. The Council would not promote the development of new communities adjacent to the Aberdeen Western Peripheral Route for these reasons, in fact one of the major benefits of the Aberdeen Western Peripheral Route is that it removes heavy vehicle movements from densely populated areas of Aberdeen which is discussed in paragraph 6.6 of the Locking in the Benefits of the Aberdeen Western Peripheral Route Final Report 2012 (CDXX).

Blue Infrastructure

892: In paragraph 6.7 and 6.8 of the Proposed Local Development Plan it clearly sets out what is included and defined within the city’s Green Space Network. These paragraphs state, 6.7 “*Aberdeen’s Green Space Network is a strategic city-wide network that connects natural green and blue spaces and habitats to each other and the communities around them. It is made up of multiple components of ‘green infrastructure’.* In line with Scottish Planning Policy, this includes;

- *Formally designated natural heritage sites;*
- *A diversity of habitats and their connectivity;*
- *Woodland, hedgerows and individual trees, especially veteran trees;*
- *Open Spaces defined in Aberdeen’s Open Space Audit;*

- *Food-growing spaces (see paragraph 6.18);*
- *Spaces for physical activity and access to the outdoors; and*
- *Paths and links for pedestrians, wheeling and cycling.*

6.8 The City's 'blue features' are also included within this Network. In line with Scottish Planning Policy, blue features include; rivers, wetlands, other water courses, ponds, sustainable urban drainage systems, porous paving, and coastal and marine areas including beaches."

It is the Council's view that the Proposed Local Development Plan is sufficiently clear that blue infrastructure is included within the principles of Proposed Policy NE3.

Core Paths

1143: The Local Development Plan is not the appropriate place to publish a code of conduct for Core Path users as this matter is not one that should be dealt with within planning policy. Such a behaviour code already exists within the Scottish Outdoor Access Code. The Local Development Plan maps and safeguards the network of core paths which are defined within the Council's Core Paths Plan (CDXX). One of the aims of Objective 6 of the Core Paths Plan is to, "*promote and encourage understanding of, and compliance with the Scottish Outdoor Access Code*". The Council's 'Accessing the Outdoors' webpage directs people to the Scottish Outdoor Access Code.

Reporter's conclusions:

Reporter's recommendations:

Issue 21	POLICY NE3: OUR NATURAL HERITAGE	
Development plan reference:	Pages 53 - 54, Additional City Wide Proposals Map (Constraints Map)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>NatureScot (888) Scottish Environment Protection Agency (892) CALA Homes (North) Ltd (900) Association for the Protection of Rural Scotland (APRS) (1143)</p>		
Provision of the development plan to which the issue relates:	Provides protection for natural heritage; avoid or reduce negative impacts on natural heritage	
Planning authority's summary of the representation(s):		
<p><u>European Sites</u></p> <p>888: Suggests word changes to Policy NE3: Our Natural Heritage. Respondent advises these changes to clarify the legislative requirements for European sites. Respondent believes they are necessary to support the conclusions contained in the Council's Habitats Regulations Appraisal (HRA) record. The Council's HRA conclusions are, in part, based on the Proposed Local Development Plan's policy having clearly set out the legislative requirements for European sites, including the need for Habitats Regulation Appraisal of proposals where necessary.</p> <p><u>Carbon Rich Soils</u></p> <p>892: Refers to carbon rich soils and considers that there is need to amend the policy and comply with Scottish Government Guidance and be transparent in terms of developer requirements where peat is likely to be present.</p> <p><u>Policy too Restrictive</u></p> <p>900: Refers to Policy NE3 Our Natural Heritage and that it requires assessments for 'all developments'. The respondent considers this is unreasonable and unnecessary in many instances.</p> <p><u>Precautionary Principle</u></p> <p>1143: In general, supports Policy NE3 and paragraphs 6.22 - 6.28 but has concerns with the last sentence of the last paragraph of the policy given the Scottish Government's emphasis on growth. Precautionary Principle as outlined in Section 8 (paragraphs 6.1-6.5) must be applied in order to protect environments/landscapes.</p>		
Modifications sought by those submitting representations:		

European Sites

888: Amend text to read as follows:

Designated Sites and Protected Species

“Development not directly connected with or necessary to the conservation management of a European site (Special Area of Conservation and Special Protected Area) and which is likely to have a significant effect on the site (either individually or in combination with other plans or projects) will be subject to an Appropriate Assessment. Where it cannot be ascertained that the development would not adversely affect the integrity of the site it will only be permitted where there are no alternative solutions, and there are imperative reasons of overriding public interest, and compensatory measures are provided to ensure that the overall coherence of the European site network is protected. (For sites not hosting a priority habitat and/or species, the reasons of public interest may include those of a social or economic nature. Where the site hosts a priority habitat type and/or a priority species, the reasons must only relate to human health, public safety or beneficial consequences of primary importance to the environment, or other reasons which in the opinion of Scottish Ministers are imperative reasons of overriding public interest.)”

Carbon Rich Soils

892: Amend text to read as follows:

“Development should avoid areas of peatland and other carbon-rich soils. There will be a presumption against development which would involve any draining or disturbance of peatland or carbon-rich soils. Developments which may result in the disturbance of peatland and carbon-rich soils will require an assessment of the likely effects on CO2 emissions. A peat management plan may be required to assess and address potential impacts on peatlands or carbon-rich soils.”

Policy / too Restrictive

900: For the section starting *“For all development proposals, the following is required”* the respondent requests this is edited to *“Where there is a potential impact identified resulting from development the following information will be assessed.”*

Summary of responses (including reasons) by planning authority:

European Sites

888: The Council’s view is that the suggested word changes would clarify the legislative requirements for European sites and given that the respondent correctly states that the Council’s Habitats Regulations Appraisal (HRA) (CDXX) conclusions are in part based on the Proposed Local Development Plan’s policies having clearly set out the legislative requirements for European sites. If the Reporter is so minded, the Council could seek to amend the wording of Proposed Policy NE3 as suggested by respondent 888.

Carbon Rich Soils

892: Scottish Planning Policy (CDX) does not prohibit development from affecting peatland or carbon rich soils. At paragraph 205 of Scottish Planning Policy it states,

“Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments should aim to minimise this release”. The wording of the following sentence from Proposed Policy NE3, *“There will be a presumption against development which would involve significant draining or disturbance of peatland or carbon-rich soils”* is discussed under Issue 32 of the Report of Examination into the extant Local Development Plan 2017 (CD XX) and concluded to be the correct wording. At paragraph 6.25 of the Proposed Local Development Plan, it states, *“Disturbance of peat and other carbon rich soils, for example through excavation or drainage, developments which may result in the disturbance of peatland and carbon-rich soils will require an assessment of the likely effects on CO₂ emissions, to reduce the impacts of development on carbon dioxide emissions”*. It is the Council’s view that the current wording of both paragraph 6.25 and the Carbon Rich Soils section of Proposed Policy NE3 are sufficient and that they offer the correct level of protection for these areas.

Policy Too Restrictive

900: Proposed Policy NE3 lists what the Council would expect to see considered for all development proposals in order to thoroughly assess their potential impact on natural heritage assets. It is not possible to know whether a development proposal will impact upon natural heritage assets if the items listed in Proposed Policy NE3 are not considered. The Council’s view is that Proposed Policy NE3 is balanced and considered and rightly ensures these hugely important natural assets have the correct level of protection that they require. Enhancing and expanding natural infrastructure is one of the focuses of Scotland’s Fourth National Planning Framework Position Statement (CDX) where emphasis is placed on blue and green infrastructure not just being an added benefit but an integrated requirement for future planning and development.

Precautionary Principle

1143: It is unclear from respondent 1143’s representation what concerns they have about the last sentence of the last paragraph of Proposed Policy NE3. The last sentence of the policy states, *“Developments which may result in the disturbance of peatland and carbon rich soils will require an assessment of the likely effects on CO₂ emissions”*.

Regarding the respondent’s comments on the Precautionary Principle, it is the Council’s view that the Proposed Local Development Plan already gives great weight to the importance of protecting sensitive landscapes and environments. This weight and importance runs throughout the entire Proposed Local Development Plan but is particularly emphasised through Proposed Policies NE1-5, and D4 and D5. An Environmental Report (CDXX) has been prepared as a supporting document to the Proposed Local Development Plan. This document comprises a Strategic Environmental Assessment and a Habitats Regulations Appraisal, both of which apply the Precautionary Principle.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 22	POLICY NE4: OUR WATER ENVIRONMENT	
Development plan reference:	Pages 55 - 57, Additional City Wide Proposals Map (Constraints Map)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scottish Water (729) Castlehill and Pittodrie Community Council (843) Opportunity North East (887) Scottish Environment Protection Agency (892) Aberdeen Harbour Board (910) Association for the Protection of Rural Scotland (APRS) (1143)</p>		
Provision of the development plan to which the issue relates:	Ensures no negative impact from flooding due to development; Assess development on coastal areas	
Planning authority's summary of the representation(s):		
<p><u>Support for Policy</u></p> <p>843: Welcome the commitment to the 'European Union Water Framework Directive'.</p> <p><u>Consultation for Licensing</u></p> <p>729: With reference to paragraph 'Foul Drainage and Water Quality' of Policy NE4 respondent notes that SEPA need to be consulted and full authorisation and relevant licensing sought where any new developer wishes to use private treatment for individual properties.</p> <p><u>Expansion of Policy</u></p> <p>887, 910: States that the South Harbour and the emerging Energy Transition Zone will be critical economic drivers for Aberdeen and Scotland. They further rightly state that the South Harbour is located within the Coastal area. Respondents state that Policy NE4 outlines a presumption against development and that it recognises that there are exceptions where development will be accepted. In principle this approach is supported. However, the respondents consider that an additional exception should be included relating to South Harbour and the Energy Transition Zone to ensure that the policy does not prevent the realisation of the economic opportunity presented.</p> <p><u>Modified Wording of Policy and Plan Text</u></p> <p>892: Objects to this policy unless their suggested modified wording is substituted into the Proposed Local Development Plan. The respondent considers that the modifications to Proposed Policy NE4 Flood Risk and Management are required in order for the policy to comply with Scottish Planning Policy and the assessments and proposed mitigation set out in the Environmental Report. Respondent also suggests word changes to paragraphs</p>		

6.35 and 6.36 in order to clarify that Sustainable Urban Drainage Systems provide flood risk mitigation not management.

Flood Mitigation

1143: Questions why there has not been consideration of planting to limit downstream flooding. Welcomes restoration of existing culverted or canalised water bodies to a naturalised state where this is possible.

Design Guidance

1143: If, in certain circumstances house building is allowed on flood plains, then guidance/directives should be provided for the design of these buildings to mitigate the damaging effects of flooding.

Modifications sought by those submitting representations:

Expansion of Policy

887, 910: Requests that Policy NE4 Our Water Environment be modified to include an additional exception:

Coastal Development

“or 5) the development is of economic importance required in support of the planned expansion of South Harbour and the Energy Transition Zone.”

Modified Wording of Policy and Plan Text

892: Amend Policy NE 4 so it reads as follows:

“Flood Risk and Management Development

Development will not be supported if:

- 1. It increases the current and/or future risk of flooding on site or elsewhere;
a. By reducing the ability of the functional flood plain to store and convey water; or
b. Through the discharge of additional surface water;
or c. By harming flood defences;*
- 2. It would be at risk of flooding itself; or*
- 3. Adequate provision is not made for watercourses to be maintained as or restored to naturalised channels wherever possible with riparian buffer strips including for maintenance access and erosion prevention access to waterbodies for maintenance; or*
- 4. It would require the construction of new or strengthened flood defences unless flood protection measures to an appropriate standard are a planned measure in a current flood risk management plan.*

The piecemeal reduction of functional floodplains will be avoided. Development on the functional floodplain will only be considered where its location is essential for operational reasons and for water compatible uses. Development must be designed and constructed to remain operational during floods and to not impede water flow. Measures to protect against or manage flood risk will be required and any loss of flood storage capacity mitigated to achieve a neutral or better outcome.

Applicants will be required to provide a Flood Risk Assessment where a development may result in a material increase in the number of buildings at risk of flooding, area of land at risk of flooding, if there is an increase in land use vulnerability compared to the existing land use or where it has been indicated in the opportunity sites schedule that one will be prepared.

There is a presumption against excessive engineering and culverting of waterbodies. Natural treatments of floodplains and other water storage features will be preferred wherever possible. There will be a requirement to restore existing culverted or canalised water bodies to a naturalised state where this is possible and supported by a flood risk assessment. Where the Council agrees that culverts are unavoidable for technical reasons, they should be designed to maintain existing flow conditions and aquatic life. Any proposals for new culverts should have a neutral impact on flood risk as demonstrated in a flood risk assessment and be linked to long term maintenance arrangements to ensure they are not the cause of flooding in the future.

Foul Drainage and Water Quality

Connection to the public sewer for foul drainage will be a prerequisite of all development where this is not already provided. Private wastewater treatment systems within the settlement boundary will not be permitted.

Surface Water Drainage

All new developments are required to incorporate SuDS to manage surface water, with the exception of single dwellings/extensions to residential properties or discharges to coastal waters. For change of use and/or redevelopment, opportunities should be sought to retrofit SuDS where appropriate.

SuDS components need to be selected based on specific site opportunities and constraints and provision should be addressed as part of a Drainage Impact Assessment (DIA) which details how surface water quality and quantity will be managed. DIAs will be required for new development proposals of 5 or more homes or 250 square metres non-residential floorspace. DIAs will also be required if the proposal falls within a sensitive area (identified in the TAN).

Coastal Development

Development will not be supported in undeveloped coastal areas (shown on the Proposals Map). Exceptions to this general presumption will be considered where the proposal:

- 1. Is dependent on that coastal location given the purpose and operation of the development; and*
- 2. There is no other suitable site, including brownfield land; and*
- 3. It respects the character and value of the landscape, the natural and historic environment, and the recreational value of the surrounding area; or*
- 4. There is an overriding environmental benefit from the proposal.*

The exceptions listed above, where considered acceptable in principle, must also meet all of the following criteria:

1. *The development must not be located in an area at risk of coastal erosion or flooding (as demonstrated in a topographical survey showing that the development lies above the 200 year flood level plus additional allowances for climate change and freeboard);*
2. *Public access to and along the coast must be protected and promoted wherever possible; and*
3. *Where marine noise modelling is deemed necessary by the Council or key agencies, it must be demonstrated that adverse impacts on bottlenose dolphins, Atlantic salmon, and any other protected species will be avoided.”*

Surface Water Drainage (paragraphs 6.35 and 6.36)

Respondent 892 also suggests word changes to the preceding Proposed Local Development Plan text at paragraphs 6.35 and 6.36. Amended wording to read:

“6.35 Sustainable Drainage Systems (SuDS) provide multiple benefits including mitigating flood risk, improving water quality and enhancing biodiversity. All new developments are required to make provision for SuDS and these should be designed in accordance with best-practice design guidance in the SuDS Manual (CIRIA C753), and the technical criterion set out in Sewers for Scotland v4.0 and its successors. In some circumstances, developments may also be required to adapt to flood risk by incorporating water resistant materials and forms of construction in line with the guidance set out in the Scottish Government’s Online Planning Advice on Flood Risk.

6.36 The Council is developing strategic-level Regional SuDS which will incorporate sustainable flood risk management at a strategic scale. There may be opportunities for developers to contribute to a Regional SuDS scheme to help address the impact of their development. Please see our Technical Advice Note (TAN) for more information.”

Summary of responses (including reasons) by planning authority:

Support for Policy

843: Support for Proposed Policy NE4 is noted and welcomed.

Consultation for Licensing

729: The respondent notes in their representation that the Scottish Environment Protection Agency need to be consulted and full authorisation and relevant licensing sought where any new developer wishes to use private treatment for individual properties, however, does not request any word changes to the Proposed Local Development Plan. The Council note this representation and agree that SEPA are a consultee in such cases.

Expansion of Policy

887, 910: It is the Council’s view that it is not necessary or appropriate to add an additional exception to the list of exceptions (1-4) under the Coastal Development section of Proposed Policy NE4. The respondents state that an additional exception is required to allow for the development of South Harbour and the Energy Transition Zone and so that the policy does not prevent the realisation of the economic opportunity presented. Proposed Policy B4 Aberdeen Harbours and Proposed Policy B5 Energy Transition Zones already provide a clear policy framework for these matters. Any future

proposals for Harbour or Energy Transition Zone development that is not covered by these policies must be assessed on its own merits against the principles outlined in Proposed Policy NE4 and all other relevant policies of the Proposed Local Development Plan.

Modified Wording of Policy and Plan Text

892: The Council agree that the suggested word changes for both the Proposed Local Development Plan text at paragraphs 6.35 and 6.36 and Proposed Policy NE4 itself would more clearly align with Scottish Planning Policy (CDXX) and the assessments and proposed mitigation set out in the Environmental Report (CDXX). If the Reporter is so minded, the Council could accept the suggested word changes.

Flood Mitigation

1143: The respondent states that the Proposed Local Development Plan does not discuss the important link between tree planting and flood risk management. At paragraph 6.41 and then into 6.42 it is stated that, *“Single trees, groups of trees, hedgerows and woodlands throughout Aberdeen all provide important benefits in terms of amenity, landscape character, nature conservation, economic value and climate change adaptation and mitigation. 6.42 We will therefore seek to protect and enhance Aberdeen’s existing stock of trees and woodland. Where trees are considered to be at risk from development or construction, we will require information and safeguarding measures in accordance with the standards set out in relevant Aberdeen Planning Guidance. We will also support opportunities to plant new trees and woodland to contribute to the existing stock”*. Within these paragraphs trees and woodlands are discussed in terms of their contribution to ‘climate change and adaptation’, flood risk mitigation falls within this wider heading. It is the Council’s view that there is a link within the Proposed Local Development Plan between trees and flood risk management and this point can be more greatly discussed in forthcoming Aberdeen Planning Guidance – Flooding Drainage and Water Quality.

Design Guidance

1143: Although occasionally developments are approved and built in areas prone to flooding, this is contrary to Proposed Local Development Plan Policy NE4 (and other Proposed Local Development Plan policies). Providing design guidance for these situations would legitimise them when in fact there should always be a presumption against developing in such areas. Therefore, the Council do not view it to be appropriate to provide such guidance.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 23	POLICY NE5: TREES AND WOODLAND	
Development plan reference:	Pages 57 - 58	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scottish Forestry (122) Cults Property Development Company Ltd (534) Dandara (711) Scottish Government (885) NatureScot (888) Barratt North Scotland (891) Homes for Scotland (897) CALA Homes (North) Ltd (900) Mr and Mrs Simon Munro (1074) Association for the Protection of Rural Scotland (APRS) (1143)</p>		
Provision of the development plan to which the issue relates:	Provides protection for trees and woodlands	
Planning authority's summary of the representation(s):		
<p><u>Control of Woodland Removal Policy</u></p> <p>122, 885: The respondent states that Policy NE5 should be strengthened by including a specific reference to the Control of Woodland Removal Policy (COWRP). Specific reference should also be made in subsequent planning guidance. Also requests that the policy is further strengthened and expanded to reflect the full range of principles in the COWRP.</p> <p><u>Forestry and Woodland Strategy</u></p> <p>122: The respondent requests that the Planning Authority prepare a Forestry and Woodland Strategy which takes a strong presumption against the felling of trees. The Proposed Local Development Plan should make clear reference to the production and use of the strategy and how the Planning Act 2019 (section 53), the COWRP, Policy NE5 and future planning guidance will work together to protect trees and woodlands.</p> <p><u>Expansion of Policy</u></p> <p>122: The respondent requests that Policy NE5 is expanded to require a full National Vegetation Classification (NVC) survey of all woodlands impacted by development, as well as appropriate fauna surveys, in order to help establish a baseline for public benefits related to biodiversity.</p> <p>122: The respondent suggests that the authority give consideration to, and accordingly amend Policy NE5, to the period of time needed for replacement planting to deliver benefits and that larger areas with diversity of species could offer greater and faster</p>		

benefit than replacement of like for like planting. Also, consideration should be given to the replacement of previous forests may not meet current planting United Kingdom Forestry Standards requirements and therefore should not be replaced with like for like.

885: Policy NE5 does not mention protection for important woodland habitat connectivity, and the need for implementation of mitigation where this occurs in association with development.

Clarity Sought:

122: The respondent requests clarification of paragraph 6.42 to determine exactly which trees are protected as they interpret paragraph 6.42 to cover all trees and it is understood that is not the intention of the Proposed Local Development Plan.

Aberdeen Planning Guidance

122: The respondent requests that the final sentence in this statement and therefore the planning guidance document itself, is amended / expanded to include the principles of how to gain Felling Permission through the planning process along with the established principles of when it is appropriate to fell and the requirement for compensatory planting and / or priority habitat restoration as possible mitigation. The respondent suggests that the text could be expanded to encourage the early planting and establishment of well planned green / woodland infrastructure in and around development sites; and the fact that grant funding is available from Scottish Forestry through the Forestry Grant Scheme (FGS) for woodland creation schemes on sites up to the master planning.

1143: Support policy however guidance on tree surgery options to reduce leaf fall and/or maintain lighting and views might be helpful.

Policy is Too Restrictive / Zone of Influence

534, 711, 891, 897, 900, 1074: Respondents make comments regarding Policy NE5 – Trees and Woodland. Request that the wording of Policy NE5 is amended to remove reference to the term ‘zone of influence’. The policy is unrealistic and should be reworded to enable flexibility in recognition that loss of trees can be necessary to facilitate development. Example is provided where if trees are lost this is not detrimental to the scheme as additional planting is an option to mitigate for loss. Policy, as currently worded, would render a number of sites unviable as delivery would not be possible without tree loss. Concerns raised in relation to “Proximity of Structures and Infrastructure to Trees”, which relates to their zone of influence. The additional new wording introduced within the Proposed Local Development Plan (“*Buildings and infrastructure should be sited to allow adequate space for a tree’s natural development, taking into account the predicted mature height, canopy spread and future rooting environment*”) also gives cause for concern and should be deleted and the wider policy reviewed, in addition to reference on the Zone of Influence within any emerging planning advice. Unless some degree of flexibility is provided, there is a danger this approach could lead to more rogue measures being adopted by individuals, such as felling unprotected trees on sites prior to lodging planning applications. This is a situation that needs to be avoided, therefore a serious review of this policy and guidance should be undertaken. Policy NE 5 goes above and beyond the requirements of the BS5837:2012 standard.

More Emphasis on Preventing Loss of Trees

888: Respondent suggests word changes to Policy NE5 in order to place more emphasis on preventing loss of trees.

Modifications sought by those submitting representations:

Control of Woodland Removal Policy

885: Policy NE5 (paragraph 2) modified to read as follows: "*Where tree removal takes place or is necessary for good arboricultural reasons, replacement planting will be required to ensure an overall net gain in tree cover. Development that does not achieve this will not be supported. The criteria for determining the acceptability of woodland removal and further information can be found within the Scottish Government's Control of Woodland Removal Policy. Ancient woodlands are of particular importance for nature, not just because of the trees, but for soil structure and diversity of flora created over time. They can also provide valued places for people to enjoy through recreation. Once destroyed, Ancient Woodlands cannot be recreated. The Scottish Government's Control of Woodland Removal Policy includes a strong presumption against the removal of woodland and this will be taken into account in decision making.*"

Expansion of Policy

122: Require a full National Vegetation Classification survey of all woodlands impacted by development.

122: The inclusion of principle of an indicative timescale of return of replacement woodland. Include reference to United Kingdom Forestry Standards. Include the principle of establishing the level of woodland related to public benefits for all woodlands that may be impacted by development proposals.

122: Amend text to read as follows: "*replacement planting will be required to ensure an overall net gain in woodland related public benefits.*"

885: Policy NE5 is modified to read as follows: "*Where applicable, root protection areas should be established, and protective barriers erected prior to any work commencing. If a development would result in the severing or impairment of connectivity between important woodland habitats, workable mitigation measures should be identified and implemented.*"

Aberdeen Planning Guidance

122: The paragraph relating to the guidance to be amended to include reference to principles of how to gain Felling Permission through the planning process along with the established principles of when it is appropriate to fell and the requirement for compensatory planting and / or priority habitat restoration as possible mitigation.

Policy is Too Restrictive / Zone of Influence

711: Policy and supporting text should be amended to read as follows: "*Development should, where possible, seek to avoid the loss of, or damage to, trees and woodlands. Development proposals will seek to increase tree and woodland cover and achieve the long-term retention of existing trees and woodlands that the planning authority consider*

worthy of retention. Where tree removal takes place or is necessary for good arboricultural reasons, replacement planting will be required to ensure an overall net gain in tree cover. Development that does not achieve this will not be supported."

891: Policy opening statement modified to read as follows: "Development should not result in the loss of, or damage to, trees and woodlands, unless appropriate mitigatory measures have been put in place that would sufficiently compensate for any associated loss". The following sentence should be removed: "Buildings and infrastructure should be sited to allow adequate space for a tree's natural development, taking into account the predicted mature height, canopy spread and future rooting environment."

897: Policy NE5 – Trees and Woodland should be modified as follows:

"Development should not result in the loss of, or damage to, trees and woodlands, unless appropriate mitigatory measures have been put in place that would sufficiently compensate for any associated loss. Development proposals will seek to increase tree and woodland cover and achieve the long-term retention of existing trees and woodlands that are worthy of retention. Where tree removal takes place or is necessary for good arboricultural reasons, replacement planting will be required to ensure an overall net gain in tree cover. Development that does not achieve this will not be supported. Where relevant, the relationship between Buildings and infrastructure should be assessed by a qualified arboriculturist having regard to relevant British Standards. Where applicable, root protection areas should be established, and protective barriers erected prior to any work commencing. See relevant Aberdeen Planning Guidance for more information."

900: The respondent requests that Policy NE5 Trees and Woodland be modified to remove the reference to Aberdeen Planning Guidance and include the following statement in its place "Where there are trees in close proximity to a development an assessment for the impact should be undertaken in accordance with BS5837:2012".

1074: The Aberdeen Planning Guidance on Trees and Woodlands requires amendment to remove the prohibition on new development within the zone of influence of an existing tree, to reflect the guidance in BS5837:2012, and to reflect the principles of Policy NE5.

More Emphasis on Preventing Loss of Trees

888: Amend Policy NE5 to read as follows:

"Development should not result in the loss of, or damage to, trees and woodlands. Sensitively designed and managed tree planting is encouraged. This includes street trees, which can be attractive and improve air quality. Development proposals will seek to increase tree and woodland cover and achieve the long-term retention of existing trees and woodlands that the planning authority consider worthy of retention. New planting is encouraged, and should be of a type, scale, design, composition and species mix that is appropriate to its locality and appropriately incorporates the woodland resource into the overall design of the scheme. Tree planting may not be appropriate in all situations and must not be at the expense of replacing other valued semi-natural habitats. Where tree removal takes place or is necessary for good arboricultural reasons, replacement planting will be required to ensure an overall net gain in tree cover. Development that does not achieve this will not be supported."

Summary of responses (including reasons) by planning authority:

Control of Woodland Removal Policy

122, 885: Paragraph 6.43 of the Proposed Local Development Plan references the Control of Woodland Removal Policy (COWPR) (CDX) alongside Scotland's Forestry Strategy (CDX). These documents have been highlighted with reference to the Council's duty to make adequate provision for the preservation and planting of trees. Paragraph 218 of Scottish Planning Policy (CDXX) discusses the COWRP in greater detail, it is not necessary for the Proposed Local Development Plan to repeat this precise wording in policy as this has already been discussed and established at a national level as well as in the preceding text to Proposed Policy NE5. The Council considers it inappropriate and unnecessary to repeat the contents of Scottish Planning Policy (CD XX) or Scottish Government Circulars or refer to them explicitly in the policy or supporting text. This would lead to unnecessary repetition and the references could become outdated within the five-year lifespan of the Proposed Local Development Plan. Furthermore, given that a new planning system is emerging from the Planning (Scotland) Act 2019 (CD XX) is it possible there will be revised Circulars to inform the new policy context.

The additional wording proposed by respondent 885 is currently contained within the Trees and Woodlands Supplementary Guidance (CDX) at page 2. It is the intention of the Council that this text will be carried forward into Aberdeen Planning Guidance.

Forestry and Woodland Strategy

122: The Council is in the process of adopting a Tree and Woodlands Implementation Plan, at the time of writing, this document is still draft. This document covers how Council owned trees and woodland will be managed and protected. Work will also commence later this year on a Forest and Woodland Strategy. The Forest and Woodland Strategy will have linkages to both Proposed Policy NE5 - Trees and Woodlands and associated Aberdeen Planning Guidance. Likewise, the Aberdeen Planning Guidance covering Trees and Woodland will contain linkages to the future Forest and Woodland Strategy.

Expansion of Policy

122: The respondent requests an expansion of Proposed Policy NE5 to require a full National Vegetation Classification survey of woodlands impacted by development and also a principle of an indicative timescale of return of replacement woodland. It is the Council's view that it is not appropriate or necessary to do so. The wording of Proposed Policy NE5 is such that there is a strong presumption against the removal of any trees, including woodland. To discuss in Proposed Policy NE5 matters related to the loss of such woodland would weaken the strong presumption against their loss. The Council do not support woodland removal within the City and will apply Proposed Policy NE5 in order to protect the highly limited resource that we have. Requiring a full National Vegetation Classification (NVC) survey and an indicative timescale of return of replacement woodland would not add to the decision-making process as the presumption is set that there will not be woodland removal.

Respondent 122 also suggests word changes to Proposed Policy NE5 to amend the sentence "*replacement planting will be required to ensure an overall net gain in tree cover*" with the requested text of "*replacement planting will be required to ensure an overall net gain in woodland related public benefits*". This is not a wording change that the Council

would support as this changes the emphasis of protection from all trees to only areas of woodland.

885: Trees and woodlands are primarily protected by Proposed Policy NE5, however all other relevant Proposed Local Development Plan policies also apply. Proposed Policy NE3 – Our Natural Heritage must also be taken into account for all development proposals. It states that for all development proposals the following will be required to be assessed, “*the contribution of the site to the surrounding habitat network and proposals to prevent fragmentation or isolation of habitats and restore or create habitat links*”. The Council’s opinion is that the wording of Proposed Policy NE3 sufficiently covers the issue raised by respondent 885 and therefore the suggested word changes are not necessary. In addition to this point, the proposed wording would not be acceptable to add to Proposed Policy NE5, the words ‘*important woodland habitat*’ would cause the Council concern as this suggests not all woodland habitat is important.

Clarity Sought

122: Trees at risk from development are assessed using BS 5837:2012 (CDXX) in relation to design, demolition, and construction. Tree surveys, including Tree Protection Plans submitted with planning applications are requested by the Council in order to assess the level of risk to trees shown on plans which are to be retained. It is the Council’s view that Proposed Policy NE5 does not imply that all trees regardless of size, species and condition are protected against development. Proposed Policy NE5 clearly states “*Where trees are considered to be at risk from development or construction, we will require information and safeguarding measures in accordance with the standards set out in relevant Aberdeen Planning Guidance*”. The COWRP (CDXX) does allow for situations where tree removal is appropriate with compensatory planting or for priority habitat restoration provided an additional public benefit test can be met. As already discussed in the Council’s response above headed ‘Control of Woodland Removal Policy’, it is not necessary to repeat policy wording that has already been agreed and set at a National level. The Council want Proposed Policy NE5 to be clear, concise and avoid unnecessary repetition.

Aberdeen Planning Guidance

122: The existing Trees and Woodland Supplementary Guidance (CDX) contains a section on Felling Permissions at page 3. It is the intention of the Council that this section will likely be carried forward into Aberdeen Planning Guidance - Trees and Woodland and amended/expanded as appropriate. The matters raised by respondent 122 have been noted and when it comes to preparing the Aberdeen Planning Guidance these issues will be thoroughly considered. The section following on from Proposed Policy NE5 titled ‘Aberdeen Planning Guidance’ discusses information that is to be included within the APG. It not a definitive and exhaustive list, therefore the Proposed Local Development Plan does not need to list every item that will be covered.

1143: It is the Council’s view that it is not necessary or appropriate to discuss tree surgery options to reduce leaf fall and or maintain lighting and views in Aberdeen Planning Guidance as proposed by respondent 1143. The Council maintain trees in streets, parks, open spaces, woodlands and Council house gardens. For all other trees the property owner has the legal right to cut back branches on any tree which is not a protected tree. Neither of these scenarios would require planning policy/guidance. Therefore, they are outwith the scope of a Local Development Plan and its Examination. To carry out works on

protected trees, permission must be granted by the Council. These scenarios are already discussed in the existing Trees and Woodland Supplementary Guidance (CDXX) and it is the Council's intention that this information will be carried forward into Aberdeen Planning Guidance.

Policy is Too Restrictive / Zone of Influence

534, 711, 891, 897, 900, 1074: Proposed Policy NE5 does not use the term "Zone of Influence". It states, "*Buildings and infrastructure should be sited to allow adequate space for a tree's natural development, taking into account the predicted mature height, canopy spread and future rooting environment.*" The existing Trees and Woodlands Supplementary Guidance (CDX) does use the term 'Zone of Influence' at paragraph 8.4.2. It is the Council's intention that this information will be carried forward and discussed in forthcoming Aberdeen Planning Guidance.

The term Zone of Influence (ZOI) is not strictly referenced within BS5837:2012 (CDXX). This reference comes from the National House Builders Council Standards 2011, Part 4.2 Building Near Trees (CDXX). 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 is an appropriate description for this purpose and builds on a well accepted and understood concept. The Council could rename this as a 'buffer zone' or 'stand-off distance' in future Aberdeen Planning Guidance, however it would not change what is being discussed, nor would it remove the requirement to establish a safe and suitable distance between trees and infrastructure, particularly dwellings.

It is the Council's view that the current proposed wording of Proposed Policy NE5 is suitable and appropriate and achieves the aim of preventing loss or damage to trees and woodland from development. Therefore, none of the suggested word changes should be made.

More Emphasis on Preventing Loss of Trees

888: It is the Council's view that Proposed Policy NE5 already has a very strong emphasis on preventing loss of/damage to trees and woodlands. The suggested wording by respondent 888 goes into a level of detail that the Council feel would be better placed in Aberdeen Planning Guidance. The suggested wording has been noted and will be fully considered when Aberdeen Planning Guidance is being developed after Examination.

Reporter's conclusions:

Reporter's recommendations:

Issue 24	POLICIES D1, D2, D3: DESIGN	
Development plan reference:	Pages 59 - 63	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Adam Gray (245) Dandara (711) Stewart Milne Homes (717) LSREF3 Tiger Aberdeen S.À.R.L. (855) NHS Grampian (882) NatureScot (888) Barratt North Scotland (891) Homes for Scotland (897) CALA Homes (North) Ltd (900) The Grandhome Trust (959) Association for the Protection of Rural Scotland (APRS) (1143) The New Aberdeen Mosque and Community Centre Project (1146)</p>		
Provision of the development plan to which the issue relates:	Ensure the delivery of well designed, sustainable places that are informed by the surrounding environment.	
Planning authority's summary of the representation(s):		
<p><u>Policy D1 - Quality Placemaking</u></p> <p>882, 1143: Support the policy.</p> <p>888: The Proposed Local Development Plan does not mention the previously used Design Review process as the extant Local Development Plan 2017 does (paragraph 3.4). The Design Review process is very helpful for addressing design issues early on in the process and if the Council intends to allow for the Design Review process this needs to be mentioned within Policy D1.</p> <p>888: The Aberdeen Placemaking Process Technical Advice Note could encompass a broader remit than is described. Suggested word changes are identified in the modifications. For selected allocations a map could be produced which expresses early placemaking principles to better inform subsequent master planning discussions.</p> <p>1146: Policy correspondence with the Vision for the New Aberdeen Mosque and Community Centre, which will meet criteria of the Policy. Promoting high quality design is of important to the city and the aim of new development is to create a visionary project - a centre of excellence for active participation in social, educational, cultural, leisure and recreational and public life.</p> <p><u>Policy D2 – Amenity</u></p>		

711: Supportive of providing quality amenity and amenity space for residents and quality environs.

959: Broadly supports policy principles.

882, 1142: Support the policy.

891: Policy should be removed from the Proposed Local Development Plan.

891, 900: The principles contained within the Policy are already an overarching requirement of Policy D1 - Quality Placemaking. The extant Local Development Plan, which advocates a design / Masterplan-led approach to new development, better reflects the spirit of creating a varied and interesting range of new housing, suited to particular site characteristics and circumstances and is a more appropriate mechanism for the delivery of homes.

Use of Aberdeen Planning Guidance

711, 717, 897, 900: There is insufficient information available within the Policy. The Local Development Plan is required to be clear and provide certainty. The Aberdeen Planning Guidance is not available therefore it is not possible to comment on the policy. Circular 6/2013 - Development Planning paragraph 81 notes information can be contained within Supplementary Guidance, especially if there is no significant change, and appropriate context remains. The policy relies on a future document with unknown status. Once the document is produced there must be the opportunity to comments.

Elements within the Policy

711, 900: Detail is required on what the minimum internal floor space standards will be.

711, 717, 891: The detail of internal and external space standards could sterilise development and lead to serious viability issues for developers and also the affordability for potential purchasers.

891, 897, 900: Existing Local Development Plan policies already require appropriate levels of external amenity space within developments. A "one size fits all" approach for new dwellings is unlikely to fit all scenarios and would likely lead to conflict with other wider policy agendas, e.g. attracting residential development within the city centre. Internal space standards are, to an extent, governed by Building Standards, whereby minimum activity and circulation space standards within new housing are set. Adding another layer of complexity through planning policy would be unnecessary, counterproductive and will not lead to an increase in the delivery of new homes. The opposite could instead be true by overcomplicating the planning application process and stifling development as a result

959: There is concern that space standards can stifle innovation or delivery of house types where there is a market need, as quality of space and landscape can be compromised in a bid to meet standards. Conditionally supports ensuring minimum standards for internal floor space and external amenity space and are prepared to support planning guidance on garden sizes where homes of up to 2 storeys should have 9 metre length gardens and 3 storeys or more should have 11 metre. Notes sometimes units will have shorter back

gardens, but the quality or quantity of private amenity space elsewhere can make up for this.

711: It may not always be possible to provide balconies for privacy/overlooking reasons and the Policy should be amended to reflect this.

717, 891, 897, 900: Underground and decked parking are likely to undermine the viability and effectiveness of sites, particularly on some brownfield sites. It should not be a requirement that these will be delivered in all developments. The Council should consider whether this is compatible with its aspirations for increased delivery of brownfield sites.

891, 897, 900: The reference to providing “*no less than 50% usable amenity space where it is necessary to provide car-parking within a private court*” should also be removed. This potentially conflicts with the Council’s aspirations for renewal of brownfield land and achieving 50dph density. Clear policies already exist on landscaping, and this arbitrary threshold for surface parking is not appropriate or consistent with the Council’s strategic priorities on land use and density. It is not clear from this policy, of what area 50% must be calculated. If there is provision of car parking in a courtyard then there are greater expectations for open space provision and that parking should be decked and underground.

959: Conditionally supports ‘*developments will provide no less than 50% useable amenity space where it is necessary to provide car-parking*’. Assumes and queries whether useable amenity space can exist elsewhere in close proximity to parking courts including on-plot and not within them.

891, 897: Requiring a “*private face to an enclosed garden or court to ensure a sense of safety and enclosure*” inserts a strict and poorly justified requirement into the complex design process. It should be for the decision maker to take a balanced view of design. The tenure of space a development looks out over does not relate to whether the design promotes “*a sense of safety and enclosure*”.

959: Conditionally supports developments ensuring all residents have access to useable private/semi-private open space. Suggests well integrated public spaces should be included as communal gardens for flatted development provided they are accessible and in close proximity to the units. Policy should include a clause allowing the Council to deviate from standards where a positively argued commercial or design case is presented.

Policy - D3 Big Buildings

855: Support the policy

882: Big buildings have a role and need beyond the City Centre. They should not be restricted to a particular location. There are a number of locations where big buildings would be appropriate out with the City Centre, for example, Aberdeen Royal Infirmary. Big buildings should therefore be determined on the basis of context and a variety of factors, including design and materials. The use of the building and economic rational are important factors in the acceptability of a building.

900: There is a very broad definition of ‘Big Buildings’ within the policy - something taller than the surrounding area. This could include a 2 storey house in an area generally of single storey. It is not considered that this is what this Policy is concerned with. The Policy

notes big buildings should not interfere with established vistas. Established vistas will have some significant value to the community, and any building will interfere with vistas regardless of size or location.

General Design Comments

245: New developments are of poor quality and poor design. They do not reflect the high quality of architecture of Aberdeen's older buildings.

Modifications sought by those submitting representations:

Policy D1 - Quality Placemaking

888: Amend policy as follows (new text underlined): "*Aberdeen Placemaking Process TAN provides guidance on placemaking requirements associated with applications, including describing the Council's expectations where the production of design strategies, Planning Briefs, Development Frameworks and Masterplans are required".*

1143: "Biodiverse open space" is mentioned, but it may be worthwhile including tree/woodland planting, given their ability to mitigate climate change through sequestration of CO2.

Policy D2 - Amenity

711: Policy should provide details on minimum standards for internal floor space. Wording concerning external amenity space should be amended to reflect that balconies are desirable but not mandatory.

717: The Aberdeen Planning Guidance is not available. It is not possible to comment on the policy. The document must be published before the examination so further comment can be made. Reference to "*underground and / or decked parking will be expected in higher density schemes*" should be deleted.

891: Policy should be removed from the Proposed Local Development Plan. The principles contained within the Policy are already an overarching requirement of the broad ranging requirements of Policy D1 - Quality Placemaking

897: Policy should be amended to remove reference to space standards in the paragraph under the above heading should be deleted.

900: Policy should be modified to Remove the following statements: "*ensure minimum standards for internal floor space and private external amenity space in terms of quantity and quality*" and "*provide no less than 50% usable amenity space where it is necessary to provide car-parking within a private court. Underground and/or decked parking will be expected in higher density schemes*".

900: Proposed Local Development Plan should clarify the points within the Policy and not within separate guidance.

Policy D3 - Big Buildings

900: Policy should be modified to provide adequate definition of 'big building' for use in this policy and to define where Policy D3 expectations will apply.

It should modify the following statement to read "*Proposals for big buildings that are considered to detract from their context and/or interfere with an established important vista will not be supported.*"

Summary of responses (including reasons) by planning authority:

Policy D1 - Quality Placemaking

882, 1143: Support for the Proposed Policy is noted and welcomed. Quality placemaking is at the core the planning system and as is outlined through Scottish Planning Policy (CDXX), Designing Streets: A Policy Statement for Scotland (CDXX) and Creating Places: A Policy Statement for Architecture and Place in Scotland (CDXX).

888: The Aberdeen City and Shire Design Review Panel, as noted within the extant Local Development Plan 2017, was established in 2010. The pool of members consisted of representatives from a number of organisations including Royal Incorporation of Architects in Scotland, Landscape Institute Scotland and Robert Gordon University. The panel members' backgrounds included relevant areas of knowledge such as Architecture, Landscape, Urban Design, Public Art, Community Engagement, Planning and Infrastructure. The remit of the Aberdeen City and Shire Design Review Panel was to consider and appraise a range of schemes (including Masterplans and Major Applications) that were significant because of size, impact, public interest, location or to set new standards for the future. The Design Review Panel was evaluated regularly with feedback from panel members, project presenters and both Aberdeen City and Aberdeenshire Planning Departments. In 2015 the decision was taken that the most appropriate way to pursue the design agenda for Aberdeen City Council was not via a joint design review panel. It is understood the Design Review Panel has been disbanded. Aberdeen City Council has a dedicated Masterplanning, Design and Conservation Team who give advice, guidance and support on design.

Design is still very much at the forefront of decision making, be this through the policy approach outlined in Scottish Planning Policy (CDXX), the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and the Proposed Local Development Plan. Applications will be assessed against these national, regional and local documents.

Early conversations on design are still encouraged and Aberdeen City provides these through a placemaking process and / or a pre-application discussion process (CDXX). The placemaking process draws on the experience and expertise of the Council's Masterplanning, Design and Conservation Team to lead and facilitate discussion and development of Development Frameworks, Masterplans and Planning Briefs in conjunction with landowners and developers. Policy H4 - Housing Mix and Need of the Proposed Local Development Plan outlines that development of 50 homes (Major Developments) will be required to provide a Masterplan, and will therefore be subject to the Placemaking Process.

The pre-application discussion process is in place to proactively front-load advice and add value on planning matters at an early scoping and feasibility stage; it relies on expertise from across the Council Planning Department including Development Management, and

the dedicated Masterplanning, Design and Conservation Team. There is no requirement to amend the Proposed Policy text.

888: The Aberdeen Placemaking Process Technical Advice Note is proposed to be an update of the extant Aberdeen Masterplanning Process Technical Advice Note (CDXX) and will form non-statutory guidance to the Proposed Local Development Plan once adopted. The Technical Advice Note will identify the parameters for when Planning Briefs, Development Frameworks and Masterplans are required. Guidance on planning applications and design strategies will not form part of the Technical Advice Note, as these will be assessed on an individual basis through the pre-application and / or planning application process. There is no requirement to amend the Proposed Policy text. Aberdeen City Council are in the fortunate position to have a dedicated Masterplanning, Design and Conservation Team who work with and assess Development Frameworks, Masterplans and Planning Briefs submitted by developers and their consultants. The production of a document to assist with placemaking principles would not be required as Aberdeen City Council has a Team who assess this.

1143: The ability of tree/woodland planting to mitigate climate change through sequestration of carbon dioxide (CO₂) is not disputed, however biodiverse open space can encompass a wider variety of habitats than trees/woodland. Issues 20: Policy NE2 - Green and Blue Infrastructure identifies the provision of biodiverse open space and notes Aberdeen Planning Guidance: Open Space and Green Infrastructure will provide information on open space requirements. There is no requirement to amend the Proposed Policy text.

1146: The comment relates to an allocated site, OP85: King Street/ Beach Esplanade. The site is identified by Council resolution for a Mosque, community facilities and open space. The commitment to the delivery of the project is noted. See Issue 15: Allocated Sites: City Centre and Urban for further comment on OP85: King Street/ Beach Esplanade.

Policy D2 – Amenity

711, 882, 959, 1142: The support for the Proposed Policy, and the provision of quality amenity, amenity space for residents and quality environs is noted and welcome.

891, 900: The text within the policy provides a further level of detail to the overarching principles of Proposed Policy D1.

Use of Aberdeen Planning Guidance

711, 717, 897, 900: Planning Circular 6/2013: Development Planning (CDXX) notes that Development Plan should focus on Vision, the Spatial Strategy, overarching and other key policies and proposals. The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in non-statutory Aberdeen Planning Guidance. However, the Proposed Local Development Plan provides details of some of the issues which will be covered by Aberdeen Planning Guidance underneath the corresponding policy.

Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no locus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following

consultation with developers, key agencies and the public. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that all stakeholders will be able to comment at the appropriate level of detail. Planning Circular 6/2013: Development Planning (CDXX) outlines the benefit of non-statutory guidance is that it can be updated quickly to take account of any issues which arises during the life cycle of the Plan. Although non-statutory guidance will not form part of the Development Plan, when adopted it will be a material consideration in decision making.

Elements within the Policy

711, 717, 891, 897, 900, 959: The text within Proposed Policy D2 relating to provide of balconies, underground and decked parking and the provision of “*no less than 50% usable amenity space where it is necessary to provide car-parking within a private court*” form part of the extant Local Development Plan 2017 through existing Supplementary Guidance: Landscape (CDXX) and prior to that formed Policy D2 of the Local Development Plan 2012 (CDXX). The space standards requirement was discussed within the Main Issues Report (CDXX) with a spread of responses supporting all three options put forward (CDXX, see Responses to Main Issues Report Representations Issue 10: Quality Places). Space standards within the Scottish context are not new, Dundee City Council Local Development Plan (CDXX) have included space standard within their Local Development Plan, and City of Edinburgh include space standards within their Design Guidance (CDXX). The impact of COVID-19 had increased the importance of internal and external space standards to ensure the need for space, air, light for health and quality of life post COVID-19. The decision to reintroduce amenity, and in particular pull through detail on residential amenity as a policy within the Proposed Local Development Plan was driven by the need to focus on health and wellbeing, as was being introduced by the Planning (Scotland) Act 2019 (CDXX) and the growing understanding of the importance of these elements to be front and centre of development through conversation with Aberdeen Health and Social Care Partnership. The impact of good amenity to mental, physical, emotional health and wellbeing was identified as being of importance, this requirement was identified before the COVID-19 pandemic, and the need for good amenity has intensified during the COVID-19 pandemic.

711, 717, 891, 897, 900, 959: With regard to the potential impacts on the viability of developments, implications for brownfield sites, internal and external space standards, usable amenity space and provision of enclosed space this will be informed by the context of the site and a decision reached based on the merit of the application. Development Management Officers will use their professional judgement to determine applications based on the site and surrounding context. This may involve considering and assessing policy which could be deemed contradictory or taking the decision to approve an application that is contrary to the Development Plan. The discretion nature of the planning system will allow for this, for example brownfield development may occur within the City Centre boundary, Proposed Policy T3: Parking as written in the Proposed Local Development Plan has a principle of ‘zero parking’, therefore it could be assumed an Officer will assess the application using the parking requirements set out in Policy T3: Parking. The provision of useable private and semi-private open space, and the list of possible ways that can be achieved (balconies, terraces, private or communal gardens) will again be judged on merit and context, in a listed building, or a Conservation Area it may not be appropriate to provide balconies due to the modification required to these building, and so Proposed Policy D6 - Historic Environment may be deemed as the overriding policy in this instance. Invasion of privacy is noted within the safe and pleasant

section of “Criteria: Six Qualities of Successful Placemaking” after Proposed Policy D1 - Quality Placemaking within the Proposed Local Development Plan. Planning applications are assessed against all relevant policies in a Development Plan, their context, and other material considerations. Decisions are reached based on the individual merits of the applications. There is no requirement to amend the Proposed Policy text.

959: The respondent refers to “*support planning guidance on garden sizes where homes of up to 2 storeys should have 9 metre length gardens and 3 storeys or more should have 11 metres.*” The figures noted are for the extant Supplementary Guidance: Landscape (CDXX) which will fall with the adoption of the next Aberdeen Local Development Plan. It is the intention that the extant Supplementary Guidance: Landscape will be used as a basis for the development of the Landscape Aberdeen Planning Guidance, as outlined above the Aberdeen Planning Guidance will be non-statutory planning guidance and will be subject to a separate adoption process that will involve public consultation.

Policy D3 - Big Buildings

855: The support for the Proposed Policy is noted and welcomed.

882: It is agreed that big buildings are determined based on their context; the definition of a big building is tied to the context on which it sits, “*it is regarded as one that exceeds the general height of the surrounding built context and/or whose footprint is in excess of the established development pattern, the urban grain, and the surrounding context*”. The context of Aberdeen Royal Infirmary is hospital buildings, who are approximately 9 storeys or above, and cover a minimum footprint of 5,000 square metres, and whose function is to provide medical treatment. The Proposed Policy describes a design-led approach on visual impact for any location, and whilst Aberdeen City Council wishes big buildings to be within the City Centre to support its needs, it does not preclude other locations where the design is a strong contextual fit in form/mass/use/accessibility. It is noted there are no modifications sought from those who made representations on the Proposed Policy. The Scottish Government have a formal requirement that any NHS development proposal has to follow a formally recorded Scottish Government design review process and that this is ratified by Architecture & Design Scotland (design review) or others prior to the funding being made available. It is understood the policy text in the extant Local Development Plan 2017 “*This policy does not apply to employment land, industrial areas and established health or educational campuses*” has resulted in unintended consequence related to funding of NHS new builds. There is no requirement to amend the policy text.

900: The definition of big buildings, relationship to suburban versus city centre and perception of size was examined within Issue 18: Policies D1 D2 and D3: Design of the Reporters Report for the extant Local Development Plan 2017 (CDXX) and was considered to be the correct approach. The definition has not changed. Vista and visual impact will be discussed in the Aberdeen Planning Guidance, for applications of this nature a Landscape and Visual Impact Assessment would be expected, and this is the most appropriate mechanism for identifying and discussion vistas. There is no requirement to amend the Proposed Policy text.

General Design comments

245: 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.

Reporter's conclusions:

Reporter's recommendations:

Issue 25	POLICIES D4 AND D5: LANDSCAPE	
Development plan reference:	Pages 63 - 64	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Cults, Bieldside and Milltimber Community Council (833) NatureScot (888) Association for the Protection of Rural Scotland (1143) The New Aberdeen Mosque and Community Centre Project (1146)</p>		
Provision of the development plan to which the issue relates:	Protect landscape, seascape and townscape character; ensure positive landscape designs informed by the surrounding environment and make a positive contribution to it.	
Planning authority's summary of the representation(s):		
<p><u>Policy D4 - Landscape</u></p> <p>833: In commenting on paragraph 7.12, note that each Local Authority produced a Landscape Character Assessment, but the opportunity has been missed to produce an integrated designation covering both banks of the Lower Dee Valley. This relates to the interaction between semi-urban Lower Deeside with rural and forested landscape South of the River Dee.</p> <p>1143: Support the policy.</p> <p>1146: The policy corresponds with the Vision for the New Aberdeen Mosque and Community Centre.</p> <p><u>Policy D5 - Landscape Design</u></p> <p>888: The penultimate paragraph of Policy D5 should be amended or text added to establish a link, and potentially make clearer, the relationship between the information required under this Policy and the design strategy that is required under Policy D1. As a minimal approach Policy D5 might simply say at the end of the paragraph that "<i>This information can also potentially be used to inform the design strategy required under Policy D1.</i>"</p> <p>1143: Support the policy.</p> <p>1146: The policy corresponds with the Vision for the New Aberdeen Mosque and Community Centre.</p>		
Modifications sought by those submitting representations:		

Policy D4 - Landscape

833: Aberdeen City and Aberdeenshire Councils should work together to produce a landscape assessment covering both banks of the Lower Dee Valley as guidance to their respective Local Development Plans.

1143: First paragraph includes the imperative “*will not be adversely affected...*” For consistency, the respondent suggests ‘*should*’ in paragraphs 2 and 4 be replaced with ‘*must*’.

Policy D5 - Landscape Design

888: Respondent considers that the following text be added to the end paragraph: “*This information can also potentially be used to inform the design strategy required under Policy D1*”

Summary of responses (including reasons) by planning authority:

Policy D4 - Landscape

833: It is acknowledged that the Dee Valley is a landscape feature that is of great importance to both Aberdeen City and Aberdeenshire. The river valley has shaped the development of the City and is one of its defining features. The area the respondent is noting as ‘both banks of the Lower Dee Valley’ is unknown, however it is thought encompasses part of the River Dee, the valley floor and the north side of the valley within Aberdeen City and the south slope of the valley opposite this located in Aberdeenshire. The areas have been assessed in terms of landscape through Landscape Character Assessments for both local authorities (CDXX and CDXX).

At a national level, in 2019 NatureScot published online the Landscape Character Types (www.nature.scot/professional-advice/landscape/landscape-character-assessment/scottish-landscape-character-types-map-and-descriptions). The area thought to be described in the representation is identified as “River Valley” within the Aberdeen City Local Authority Area, this encompasses the river, the valley floor and the north side of the valley. The south side of the valley sits within the Aberdeenshire Local Authority area and is identified in the Landscape Character Types as “Broad Wooded and Farmed Valley”. At a local level, Landscape Character Areas are noted as “Lower Dee Valley” with Aberdeen City’s Landscape Character Assessment (CDXX), and “Agricultural Heartlands” within Aberdeenshire’s Landscape Character Assessment (CDxx). These designations have been set within the national suite of documents, and form recognised Landscape Character Type based on areas of consistent and recognisable landscape character, and Landscape Character Area’s based on differences and local distinctiveness.

The area in question has been assessed by existing Landscape Character Assessments. Creating an integrated designation covering both banks of the Lower Dee Valley could be viewed as a repetition of text contained within the above-named documents. The Landscape Character Assessments are material considerations as part of the planning process.

1143: The support for the Proposed Policy is noted and welcomed. Scottish Planning Policy (CDXX) says the planning system should facilitate positive change while

maintaining and enhancing distinctive landscape character. The policy does apply the Precautionary Principle, in that the elements which make up Aberdeen's character and provide it with a sense of place will not be adversely affected by development, and elements which contribute to Aberdeen's character and sense of place will be given the opportunity to be conserved or enhanced. The use of 'should' rather than 'must' within paragraphs two and four of the policy echoes paragraph 202 of Scottish Planning Policy (CDXX) which notes, "*The siting and design of development should take account of local landscape character. Development management decisions should take account of potential effects on landscapes and the natural and water environment, including cumulative effects. Developers should seek to minimise adverse impacts through careful planning and design, considering the services that the natural environment is providing and maximising the potential for enhancement.*" There is no requirement to modify the Proposed Policy.

1146: The comment relates to an allocated site, OP85: King Street/ Beach Esplanade. The site is identified by Council resolution for a Mosque, community facilities and open space. The commitment to the delivery of the project is noted. See Issue 15: Allocated Sites: City Centre and Urban for further comment on OP85: King Street/ Beach Esplanade.

Policy D5 - Landscape Design

888: The expansion of the Proposed Policy to meet the provision of other policies and aspirations is not required. Each policy has a distinct focus. Proposed Policy D5 in principle requires landscape frameworks to be considered early on in the design process, incorporate existing landscape character and features, while also ensure biodiversity, connectivity and adaptation and resilience to climate change are integral to any landscape design. Proposed Policy D1 provides the overarching policy for all development to ensure there is quality of Placemaking by design, which includes consideration of a number of different issues including landscape. To highlight a link only to one area of crossover may be detrimental to other areas where there is policy crossover.

1143: The support for the Proposed Policy is noted and welcomed.

1146: The comment relates to an allocated site, OP85: King Street/ Beach Esplanade. The site is identified by Council resolution for a Mosque, community facilities and open space. The commitment to the delivery of the project is noted. See Issue 15: Allocated Sites: City Centre and Urban for further comment on OP85: King Street/ Beach Esplanade.

Reporter's conclusions:

Reporter's recommendations:

Issue 26	POLICIES D6 AND D7: HISTORIC ENVIRONMENT	
Development plan reference:	Pages 64 - 66	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Stewart Milne Homes (717) Cults, Bieldside and Milltimber Community Council (833) Castlehill and Pittodrie Community Council (843) NHS Grampian (882) Scottish Government (885) Barratt North Scotland (891) Homes for Scotland (897) CALA Homes (North) Ltd (900) Association for the Protection of Rural Scotland (APRS) (1143)</p>		
Provision of the development plan to which the issue relates:	Ensure the City's historic environment is protected, retained and reused; ensure additions are positive.	
Planning authority's summary of the representation(s):		
<p><u>Policy D6 - Historic Environment</u></p> <p>885: Respondent considers there to be inconsistencies with the terminology used on pages 65 and 103, Policy D6 - Historic Environment of the Proposed Local Development Plan. The respondent asserts that the terminology used in relation to the historic environment are inconsistent between Policy D6 and those in the Glossary.</p> <p>855: Respondent suggests that additional text is required to align with paragraph 145 of Scottish Planning Policy as Historic Environment Scotland are the consenting authority for direct works affecting Scheduled Monuments.</p> <p>885: The Proposed Policy is confusing as designations and local authority responsibilities have been conflated in this paragraph. The paragraph should be modified to reflect the advice in Scottish Planning Policy and the difference between designated and non-designated archaeology. Archaeological remains of national importance are scheduled monuments and Historic Environment Scotland are the consenting authority and the local authority have no remit over them. No specific text modifications are outlined but the following text is presented as the representation: "<i>Developments that would adversely impact upon archaeological remains, of either national or of local or regional importance, or on the setting or scheduled monuments will only be permitted in exceptional circumstances, where there is no practical alternative site and <u>where there are imperative reasons of over-riding public need.</u></i>"</p> <p>1143: Support the policy</p>		

Policy D7 - Our Granite Heritage

717, 891: The importance of maintaining the City's granite heritage is appreciated but should not be at all costs. A flexible approach must be adopted, particulate for building that are neither listed nor in a Conservation Area. Some buildings are beyond viable retention or are not worthy of retention. The individual merits need to be considered. The tests proposed are too onerous, as these give all granite building the same status as listed buildings, and buildings within Conservation Areas.

717, 891: Visible reuse of granite will add cost to development, may prejudice the viability of development, and material may not be capable of re-use as a building material, or may be costly to rework.

891: The policy should identify that re-use of salvaged materials shall be required where "practically possible", similar to the wording of existing Policy D5 within the extant Local Development Plan 2017 and more recent Technical Advice Note on Materials (March 2020).

833: In commenting on paragraph 7.19 and Policy D7, agree with inclusion of granite boundary walls as they are an important part of local granite heritage. Queries why developers have been able to demolish these walls under permitted development.

843: Excellent to see the requirement to reuse construction materials, in particular granite and other historically significant material. There needs to be a concerted effort to preserve rather than demolish granite buildings and streets which are part of the distinct character and heritage of the city.

882: Support the policy.

897: While noting the importance of granite buildings the respondent does not consider the effect of this policy to be clear and is unsure if it considers granite building or listed buildings differently.

900: Respondent considers the policy quoting the criteria for demolition with some alteration from Historic Environment Scotland's Managing Change Document Demolition. The respondent thinks the document should be referenced rather than summarised. The respondent also considers that when the tests for demolition are met re-use of salvaged materials is required and that this assumed a site would be redeveloped. This is also considered repetition of Historic Environment Scotland guidance.

Modifications sought by those submitting representations:

Policy D6 - Historic Environment

885: Amend page 65, Policy D6 - Historic Environment - fifth paragraph to include "*Any works directly affecting a designated Scheduled Monument requires Scheduled Monument Consent (SMC) which is obtained from Historic Environment Scotland. Advice on the SMC process and any requirements should be sought at an early stage from Historic Environment Scotland, (Telephone: 0131 668 8716 or email: hmenquiries@hes.scot)*"

Policy D7 - Our Granite Heritage

717: Policy wording should be amended to encourage the retention of granite buildings only in appropriate and viable circumstances. The tests for demolition of granite properties should be deleted.

891: Policy should be modified to provide greater distinction to the importance afforded to listed buildings and non listed historic granite buildings within Conservation Areas, in comparison to other general granite buildings and structures which do not fall within said designations. Accordingly, the second paragraph should be modified to read as follows: *“Proposals to demolish any listed granite building, structure or feature, ~~partially or completely~~, or non-listed granite building within a conservation area, will not normally be granted listed building consent or conservation area consent. Proposals for the demolition of other granite buildings outwith these designations will be assessed on their own merits based on an appropriate supporting justification.”* The statement that seeks the reuse of all the original granite as a building material within the development site should also be amended to reflect the more flexible wording of the extant Local Development Plan 2017, which stipulates that, *“as much of the original granite as is practically possible....”*

897: The following changes are necessary to provide clarity and also allow the removal of buildings in Conservation Areas where they are not assessed as contributing positively to the area:

“The Council seeks the retention or ~~and~~ appropriate re-use, conversion and adaption of all historic granite buildings, structures and features, including setted streets, granite kerbs and granite boundary walls.

Proposals to demolish any granite building, structure or feature, partially or completely, will not normally be granted planning permission, conservation area consent or listed building consent unless justification is provided to demonstrate otherwise.

Any listed building; structure or feature in the curtilage of a listed building; or any unlisted building, structure or feature in a Conservation Area, (including those of granite construction) may only be demolished where:

- *evidence is provided to demonstrate that every effort has been made to retain it, and:*
- *It is no longer of special interest or cultural significance; or*
- *It is incapable of meaningful repair; or*
- *it is not listed and is located in a conservation area but not assessed as making a positive contribution to that area; or*
- *It can be demonstrated the demolition is essential to delivering significant benefits to economic growth or the wider community; or*
- *Its repair and reuse is not economically viable and that it has been marketed in an open and transparent manner.”*

900: Amend the policy to state:

“The Council seeks the retention and appropriate re-use, conversion and adaption of all historic granite buildings, structures and features, including setted streets, granite kerbs and granite boundary walls.

Proposals to demolish any granite building, structure or feature, partially or completely,

~~will not normally be granted planning permission, conservation area consent or listed building consent will be determined in accordance with HES Managing Change guidance: Demolition.~~

Summary of responses (including reasons) by planning authority:

Policy D6 - Historic Environment

885: The development of Proposed Policy D6 considered Scottish Planning Policy (CDXX), Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and Historic Environment Policy for Scotland (CDXX). The Aberdeen City and Shire Strategic Development Plan 2020 notes (CDXX, page 40) heritage assets are valued for their contribution to the historic environment, they also contribute to a sense of place, the economy and the natural environment and should be protected from unacceptable impacts of development. Scottish Planning Policy (CDXX) paragraph 137 notes the planning system should “*enable positive change in the historic environment which is informed by a clear understanding of the importance of the heritage assets affected and ensure their future use. Change should be sensitively managed to avoid or minimise adverse impacts on the fabric and setting of the asset, and ensure that its special characteristics are protected, conserved or enhanced*”. The definition of Historic asset / Heritage asset is taken from Historic Environment Policy for Scotland (CDXX), “*An asset (or ‘historic asset’ or ‘heritage asset’) is a physical element of the historic environment – a building, monument, site, place, area or landscape identified as having cultural significance*” as asset is not defined in Scottish Planning Policy (CDXX). The historic environment is defined in the Glossary of Scottish Planning Policy, and in Historic Environment Policy for Scotland as “*Scotland’s historic environment is the physical evidence for human activity that connects people with place, linked with the associations we can see, feel and understand*”. It is noted for clarity a virgule (forward slash) between historic environment / asset would assist greatly in the reading of the policy. If the Reporter is so minded in paragraph 2 and 4 of the Proposed Policy “historic environment asset” could be modified to read “historic environment / asset”, and the definition of historic environment from Scottish Planning Policy and Historic Environment Policy for Scotland can be added to the Glossary of the Proposed Local Development Plan.

885: With regarding the proposed text changes to paragraph 5 of Proposed Policy D6, the process relating to Scheduled Monument Consent is outlined within the Ancient Monuments and Archaeological Areas Act 1979 (CDXX), as amended by the Historic Environment (Amendment) (Scotland) Act 2011 (CDXX) and the Historic Environment Scotland Act 2014 (CDXX). Procedural requirements and the process of requiring consent are not required within a Development Plan; Planning Circular 6/2013: Development Planning (CDXX) notes that Local Development Plan should have a focus on Vision, the Spatial Strategy, overarching and other key policies and proposals. The request to insert the paragraph noting Scheduled Monument Consent is obtained from Historic Environment Scotland and contact information is not the level of detail for a Local Development Plan. Furthermore, the lifespan of a Local Development Plan may render this information out of date and invalid. There is no requirement to amend the Proposed Policy text.

885: The development of Proposed Policy D6 considered Scottish Planning Policy (CDXX), the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX), Historic

Environment Policy for Scotland (CDXX), and Planning Advice Note 2/2011: Planning and Archaeology (CDXX). The paragraph within the Proposed Policy text relating to scheduled monuments and archaeology is for the most part a 'rollover' of the extant Local Development Plan 2017 (CDXX) Policy D4. The wording of the first sentence of the policy has been modified to state "*in situ preservation...is expected*" rather than "*in site preservation...will be supported*". It is felt this linked more strongly to the opening sentence of Proposed Policy D6 and to Historic Environment Scotland: Scheduled Monument Consents Policy (CDXX) which notes the aim of including a monument in the schedule is to secure its long term protection in situ.

It is not disputed that the consent process for Scheduled Monuments is via Scheduled Monument Consent however, it is possible that some works will require more than one type of planning consent. Some works will require both planning permission and Scheduled Monument Consent. Works affecting the setting of a Scheduled Monument fall within the remit of Historic Environment Scotland (where the works directly impact on, and potentially change, the original criteria for why the site was scheduled in the first place), and the Local Authority (whose role is to assess the wider setting impacts on a scheduled monument), therefore there is a requirement for text relating to planning permission with regard to Scheduled Monument, this would help to guide decision making. There is no requirement to amend the Proposed Policy text.

1143: Support for the Proposed Policy is noted and welcomed.

Policy D7 - Our Granite Heritage

717, 891, 897: The principle to retain, appropriately reuse, conserve and adapt all granite buildings, structures and features is the same approach as that currently adopted in the extant Local Development Plan 2017 (Policy D4) (CDXX), and prior to that within Policy D4 of the Local Development Plan 2012 (CDXX), and were discussed in the Examinations into those Plans (CDXX / CDXX). Paragraph 137 of Scottish Planning Policy (CDXX) notes the planning system should promote the care and protection of the designated and non-designated historic environment while Historic Environment Policy for Scotland (CDXX) states, "*When decisions are made that affect places of cultural significance, the focus should be on avoiding or minimising adverse impact. Wherever possible, special characteristics and qualities should be protected, conserved or enhanced...These principles apply to the whole of the historic environment*". The Proposed Policy aims to achieve this. The use of granite as a building material gives Aberdeen its identity. Paragraph two of the Proposed Policy notes there are statutory decision-making processes in place (planning permission, conservation area consent or listed building consent), and paragraph three of the Proposed Policy identifies the statutory designations where demolition tests are to be applied; statutory decision-making processes cannot be overridden by the policy. The General Permitted Development (Scotland) Order 1992, as amended (CDXX) is also of note when discussing the Proposed Policy. The five bullet points on demolition relate to buildings with statutory designations, those that are listed buildings, or those within conservation areas. The complete demolition of buildings without statutory status is covered in Class 70 of the General Permitted Development (Scotland) Order 1992, as amended (CD/RDXX). Modification of the Proposed Policy is not required.

717, 891, 900: The Reporter's Report into the extant Local Development Plan 2017 (CDXX) noted the policy at that time (Policy D5) required users of the Local Development Plan to refer to Historic Scotland's Scottish Historic Environment Policy (2011) tests for demolition. This was deemed to be inconvenient and opaque. The policy approach taken

in the Proposed Local Development Plan aims to rectify this. The criteria regarding demolition found within paragraphs 3.50 and 3.58 of Historic Scotland's Scottish Historic Environment Policy (2011) (CD/RDXX) were lost when Historic Scotland's Scottish Historic Environment Policy (2011) was replaced by Historic Environment Scotland Policy Statement (2016) (CDXX), and then by the Historic Environment Policy for Scotland (2019) (CD/RDXX). Further detail on the demolition of listed buildings and buildings within Conservation Areas was to be found within Managing Change in the Historic Environment: Demolition (CD/ RDXX). This document has been updated to Managing Change in the Historic Environment: Demolition of Listed Buildings (CDXX), however there is no subsequent Managing Change documents relating to demolitions in Conservation Areas. Between the time of writing the Proposed Policy up until the present there has been a guidance void relating to demolition in Conservation Areas which this Proposed Policy aims to address. Of the five bullet points noted in the Proposed Policy, there is one overarching criteria "*evidence is provided to demonstrate that every effort has been made to retain it* [buildings, structures and feature]", followed by four 'or' criterion. Assessment of competence for demolition is not expected to meet all five of the criteria but is expected to meet the one overarching criterion plus one other. It is therefore considered the tests are not too onerous. They also fill a void in terms of demolition criteria as Managing Change in the Historic Environment: Demolition (CDXX) is no longer in use. Modification of the Proposed Policy is not required.

717, 891: Demolition is a last resort. Where the tests for demolition have been met the visible re-use of salvage materials on site is required. This could include its use on building elevations, within landscape design and boundary features. The policy wording of the extant Local Development Plan 2017 has resulted in a mixed approach to the reuse of granite, and it was felt strengthening the policy to ensure that granite is incorporated in a more meaningful was required. Modification to the policy text is not required.

833, 843, 882: The support for the Proposed Policy is noted and welcomed.

833: The principle of the Proposed Policy is to retain granite walls. The consent process for demolition is managed through Listed Building Consent, and Conservation Area Consent depended on the statutory designation. Structures and features outwith statutory designations are subject to General Permitted Development (Scotland) Order 1992, as amended (CD/RDXX).

Reporter's conclusions:

Reporter's recommendations:

Issue 27	POLICIES R1, R3 AND R5: MINERALS, CONTAMINATED LAND, AND WASTE	
Development plan reference:	Pages 68 - 71	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Mr Robert Black (18) Stewart Milne Homes (717) Scottish Government (885)		
Provision of the development plan to which the issue relates:	Provides criteria for mineral extraction; remediation of contaminated land; provision of waste facilities	
Planning authority's summary of the representation(s):		
<p><u>Policy R1 – Minerals</u></p> <p>885: The policy lacks important requirements as set out in Scottish Planning Policy in terms of mineral extraction. Policy R1 should be amended to set out clearly how it will manage factors associated with the mineral extraction industry e.g. disturbance, disruption, noise, vibration, etc. Policy R1 should be amended to include specific text on supporting the maintenance of a landbank of permitted reserves for construction aggregates of at least 10 years. As it stands the policy does not align with Scottish Planning Policy.</p> <p>Paragraph 237 of Scottish Planning Policy sets out the factors proposals need to address to ensure local communities who are vulnerable to the worst effects of mineral extraction, such as dust, noise and increased traffic are given an important level of protection when planning proposals come forward. This protection allows the planning authority to ensure operators, through conditions, take into account local communities and their protection from adverse effects</p> <p>Paragraph 238 of Scottish Planning Policy requires Plans to support the maintenance a 10 year landbank across market areas. This ensures that there is sufficient aggregate to deliver construction ambitions outlined within the Plan. The absence of a reference to the landbank not only means there is a potential danger of insufficient consented aggregates within the market area but could also cause unnecessary delay in the identification of the need for new sites and for operators trying to gain planning permission.</p> <p><u>Aberdeen Planning Guidance</u></p> <p>717: The Local Development Plan is required to be clear and provide certainty. The Aberdeen Planning Guidance is not available. It is not possible to comment on the policy. The document must be published before the Examination so further comment can be made.</p>		

Circular 6/2013 - Development Planning (paragraph 81) notes information can be contained within Supplementary Guidance, especially if there is no significant change, and appropriate context remains. The policy relies on a future document with unknown status.

Policy R3 - New Waste Management Facilities

885: Respondent refers to paragraphs 8.6 and 8.7 of the Proposed Local Development Plan and considers that there should be a reference to the maximisation of the value of secondary resources and waste will be enabled through the Proposed Local Development Plan, in these sections. Any such references could include reuse, refurbishment, remanufacturing and reprocessing of high value materials and products. Such changes would reflect the requirements of paragraph 180 of Scottish Planning Policy.

General

18: Respondent thinks that the Council should use future composting plant in Tullos to fertilise cash crops. Waste recycling technology has advanced in the last 2 or 3 years, and there are numerous United Kingdom companies using proven technology to safely turn waste plastics into construction materials such as “plastic wood”, insulation blocks, paving stones, beams for construction, roof tiles. It would benefit the Council greatly in the long run to start manufacturing these items itself to sell to construction companies that build Council properties. There are many sites around Aberdeen where the Council could build large, tastefully designed, greenhouses using mostly recycled building materials using Council labour, thereby creating large resources from waste.

Modifications sought by those submitting representations:

Policy R1 - Minerals

885: The reference to the Quarry Products Association’s Restoration Guarantee Scheme should be deleted and replaced. Heads of Planning Scotland in October 2018 produced an updated position statement on the Financial Mechanisms to secure decommissioning, restoration and aftercare of development sites, which should replace the reference to the Quarry Products Association guarantee scheme.

Aberdeen Planning Guidance

717: The Aberdeen Planning Guidance is not available and must be published before the examination so further comment can be made.

Summary of responses (including reasons) by planning authority:

Policy R1 – Minerals

885: It is considered that the level of detail provided by Proposed Policy R1 is appropriate for a Local Development Plan. The policy states that minerals proposals will only be acceptable if:

1. *“there is no significant impact on the character and amenity of the surrounding landscape or residential properties/local communities or on the ecology of the area; and*

2. *sufficient information has been submitted with a planning application to enable a full assessment of the likely effects of development, together with proposals for appropriate control, mitigation and monitoring (the main considerations are set out in relevant national guidelines);*..... etc

This makes it clear that the amenity of residential areas and communities is an important consideration in determining proposals. The Proposed Policy points out that further considerations on these matters are set out in relevant national guidelines. It is therefore unnecessary to repeat these within the Proposed Local Development Plan.

In terms of maintaining a 10 year landbank of minerals, it needs to be borne in mind that Aberdeen has a small hinterland within its administrative boundaries and opportunities for quarrying are much more limited here than they would be in a rural authority. The City Council does however, recognise the importance of having a long term supply of aggregates close to Aberdeen in order to support the construction industry and reduce transportation. Green Belt covers nearly all of Aberdeen's rural area and Proposed Local Development Plan Policy NE1 Green Belt permits mineral extraction in the Green Belt in principle. In addition there are two major quarries at Blackhills, Cove and North Lasts, Peterculter and both are identified and reserved for mineral extraction in the Proposed Local Development Plan (see paragraph 8.2 and Appendix 2 pages 113 and 116).

North Lasts Quarry is identified as OP44 in the Proposed Local Development Plan. It lies to the north of Peterculter and has been used for the extraction of hard rock, mainly for road construction, since the late 1970s. Planning permission reference 161687/DPP (CDXX, CDXX) for the continuation of hard rock quarrying operations (including the operation of asphalt plant), and the extension to the existing quarry, including deepening to the 48 metre Above Ordinance Datum (AOD) level and the processing of overburden material, was granted in 2017 and runs until 30th April 2047.

Blackhills Quarry is identified as OP55 in the Proposed Local Development Plan. Planning permission reference P130490 for the extension of the existing Blackhills Hard Rock Quarry was granted by the Council on 7 January 2015, for continued hard rock extraction and processing on the site for a period of 37 years (CDXX, CDXX). Application P130490 was recommended for approval on the basis that it would ensure a land bank of permitted reserves for a period exceeding 10 years.

Because these consents are already in place it is considered unnecessary to refer to the 10 year landbank requirement in the Proposed Local Development Plan.

885: In respect of the modification sought on the Quarry Products Association's Restoration Guarantee Scheme, Proposed Local Development Plan Policy R1 states the following;

"4. restoration will take place concurrently with excavation where possible. After excavation ceases, restoration will be completed in the shortest time practicable and the proposals accompanied by either an appropriate financial bond or supported by an industry guarantee scheme (such as the Quarry Products Association's Restoration Guarantee Scheme). The proposed after use will add to the cultural, recreational or environmental assets of the area."

The Quarry Products Association's Restoration Guarantee Scheme is therefore simply used as an example. The Policy does not preclude other means of securing restoration and so no change is required.

Aberdeen Planning Guidance

717: The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in Aberdeen Planning Guidance, which will replace Supplementary Guidance. Proposed Local Development Plan Policy R5 provides details of some of the issues which will be covered by Aberdeen Planning Guidance in terms of waste management requirements for new developments.

Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no locus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public, in the same way that consultation was undertaken on the current Supplementary Guidance. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that all stakeholders will be able to comment at the appropriate level of policy detail at the appropriate time.

Policy R3 - New Waste Management Facilities

885: It is not considered necessary to repeat all the requirements of Scottish Planning Policy (CDXX). Paragraphs 8.5 to 8.7 of the Proposed Local Development Plan provide a reasonable summary of the types of waste facility that are likely to be required over the lifetime of the Plan. Proposed Policy R3 provides both criteria for waste proposals and identifies specific sites. It also directs waste developments to Business and Industrial Areas (B1 areas on the Proposals Map). There is a large amount of B1 land identified in Aberdeen with a good geographical spread all around the City. It is therefore considered that the present and future needs of the waste industry are well catered for and can be accommodated through the Proposed Local Development Plan.

General

18: Local Development Plans are documents used to help determine what land should be used for. They do not go into the detail expressed in this representation. As mentioned in the response above, there are many sites and opportunities available for waste management facilities. Equally there is an ample supply of business land available for the type of manufacturing described. Therefore, the Proposed Local Development Plan provides the means (in planning terms at least) for such an enterprise to take place.

Reporter's conclusions:

Reporter's recommendations:

Issue 28	POLICIES R6, R7 AND R8: EFFICIENT AND RENEWABLE DEVELOPMENTS	
Development plan reference:	Pages 71 - 74	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Jane Stirling (504) Stewart Milne Homes (717) Shell UK Limited (730) Scottish Enterprise (759) Scottish Hydro Electric Transmission plc (768) Aberdeen International Airport (788) NatureScot (888) Barratt North Scotland (891) Homes for Scotland (897) CALA Homes (North) Ltd (900) The Grandhome Trust (959) Association for the Protection of Rural Scotland (1143)</p>		
Provision of the development plan to which the issue relates:	Requirement to reduce carbon emissions, be water efficient and use renewable technology	
Planning authority's summary of the representation(s):		
<p>Policy R6 - Low and Zero Carbon Buildings and Water Efficiency</p> <p><u>Support for the importance of addressing climate change</u></p> <p>717, 891, 897, 959: The importance of addressing climate change and reducing carbon emissions is recognised.</p> <p><u>Issue should be addressed through building standards</u></p> <p>717, 891, 897, 900; 959: The requirement to reduce carbon emissions is the remit of Building Standards, the calculations involved are complex and the policy is duplicating the statutory measures. The requirements of Policy R6 are not directly reflected within Scottish Planning Policy and should be addressed through Building Regulations rather than the Local Development Plan.</p> <p><u>Fabric First Approach</u></p> <p>717, 891: A “fabric first” approach should be adopted ahead of the requirement to install low and zero carbon generating technologies. Such technologies are often unproven, quickly outdated and add significantly to the cost of development, when other, more efficient, methods can deliver the required carbon reduction. This can exacerbate viability issues.</p> <p><u>Use of Aberdeen Planning Guidance</u></p>		

717, 900, 959: The Aberdeen Planning Guidance is not available. It is not clear what the expectations of the Policy are and within what scope any further non-statutory guidance would provide further detail; this must be specified within the Policy.

Water Efficiency

717, 891, 897, 900: Water efficiency measures are the remit of Building Standards. Whilst the impact of development on the River Dee is understood, a blanket requirement for all new buildings to use water saving technologies and techniques, with details to come in later guidance, is vague and means the impact of the Policy is not clear. It should instead require a statement explaining how water efficiency has been considered in the development.

888: Welcome and support the water efficiency requirements at Policy R6, in particular given the acknowledged pressure on the River Dee Special Area of Conservation as noted at paragraph 8.13. As such, would look for those requirements to be retained for all new buildings, rather than (as suggested by paragraph 8.17) just those that are not part of a heat network.

Existing Stock

891, 959: The Council should focus measures to implement schemes to improve older housing stock across the city, which are much less energy efficient.

Policy R7 Renewable and Low Carbon Energy Developments

Support for the Policy

788: Respondent is supportive of Policy R7

Pipeline Consultations

730: Policy R7 and associated Supplementary Guidance on Wind Turbine Development should include specific reference to Pipeline Consultation Zones that cross the Aberdeen Local Development Plan area. The Proposed Local Development Plan and associated Supplementary Guidance does not currently make any reference to this. Request modification to Policy R7 to ensure any potential conflicts between wind turbines and existing oil and gas pipelines are avoided. Guidance note is submitted with representation.

759: Policy should be amended to make specific reference to hydrogen developments within the City, reflecting the two hydrogen refuellers at Kittybrewster and Cove and the potential hydrogen capabilities of TECA alongside the existing hydrogen vehicle fleet.

Technical Aspects for Wind Turbine Developments

1143: Welcome caveats to windfarm developments. To achieve balance between the environment and requirements of windfarms it is important to seek optimal solutions not ones that seek to maximise energy. Consideration should be made to different forms of turbines dependent on the wind speeds of particular areas whilst considering all of the elements of a windfarm development.

Policy R8 – Heat Networks

Use of Aberdeen Planning Guidance

717, 891, 897, 900, 959: The Local Development Plan is required to be clear and provide certainty. The Aberdeen Planning Guidance is not available. It is not possible to comment on the policy. The document must be published before the examination so further comment can be made. Circular 6/2013 Development Planning (paragraph 81) notes information can be contained within Supplementary Guidance, especially if there is no significant change, and appropriate context remains. The policy relies on a future document with unknown status.

Scale of Development

717, 891, 897: SEPA recent guidance for District Heating 2019 requires connections in two circumstances; anchor/significant developments and developments adjacent to existing heat networks/sources. Policy R8 references Major Applications (50 homes or more) this would not constitute substantial development and reference to Major Applications should be deleted.

Development Viability

717, 891, 897: 900: The approach adopted by the extant Local Development Plan 2017 is favoured. This allows heat networks to come forward for appropriate developments where they are considered viable but would not require heat networks to be created when these are not feasible, appropriate, or deliverable. The Policy will place a significant additional burden on the housebuilding industry to try and plug existing gaps in the distribution of heat networks throughout the confines of the city. Heat networks require significant infrastructural investment and need to be planned. Policy R8 provides no guarantee that such networks will ever come forward, therefore investment in significant plant that could effectively become obsolete is a situation that must be resisted.

Water Efficiency

888: Paragraph 8.17, and under the Policy R8 subheading of Low and Zero Carbon Generating Technologies, where the policy says: "*Where a development connects to an existing Heat Network or provides a new network it will be deemed compliant with Policy R6: Low and Zero Carbon Buildings, and Water Efficiency.*" The respondent does not consider that connecting to a Heat Network or providing a new network will address the water efficiency requirements of Policy R6 and sees difficulties as to how it would be compliant with that aspect. The respondent recommends a small addition to wording at paragraph 8.17 to help clarify this point.

General

504: Energy considerations need to be at the forefront of housing developments. Properties need to be sustainable.

768: Respondent supports aim of paragraph 8.14 which deals with Renewable and Low Carbon Energy Developments.

Modifications sought by those submitting representations:

Policy R6 - Low and Zero Carbon Buildings and Water Efficiency

717: The Aberdeen Planning Guidance is not available. It is not possible to comment on the Policy. The document must be published before the Examination so further comment can be made.

717: Rewrite the Policy to focus only on matters that can be directly influenced delivered by planners. The requirement to install low and zero carbon systems should specially be removed.

891: Policy should be re-written to allow for a Fabric First approach as a continued and successful means of addressing building standards requirements. The Policy should read as follows: "*All new buildings will be required to demonstrate that a proportion of the carbon emissions reduction standard set by Scottish Building Standards will be met through the installation and operation of low and zero carbon generating technology or a fabric first approach. The relevant Building Standards and percentage contribution required is set out in Aberdeen Planning Guidance. The Aberdeen Planning Guidance will be kept under review to ensure the proportion of the carbon emissions reduction standard to be met by these technologies will increase over time up to date to reflect current building standards.*"

897: The Policy should be modified as follows: "*All new buildings will be required to demonstrate that a proportion of the carbon emissions reduction standard set by Scottish Building Standards will be met through the installation and operation of low and zero carbon generating technology or a fabric first approach. The relevant Building Standards and percentage contribution required is set out in Aberdeen Planning Guidance. The Aberdeen Planning Guidance will be kept under review to ensure the proportion of the carbon emissions reduction standard to be met by these technologies will increase over time up to date to reflect current building standards.*"

900: The Policy should be modified to identify a set percentage of renewable energy that is based on current evidence through the application of the Building Standards Technical Handbook. This is a minimum requirement of Section 3F of the Town and Country Planning (Scotland) Act 1997. Rises in the requirements should be in accordance with reviews of the Technical Handbook to ensure consistency and an evidence-based consideration to the review of requirements.

900: The Policy should be modified to specify what is required of development in relation to water efficiency measures.

959: The extant approach taken on Low and Zero Carbon Generating Technologies and Water Efficiency should be retained in the Proposed Local Development Plan.

Policy R7 - Renewable and Low Carbon Energy Developments

730: Amend point 4 on page 72 of Proposed Local Development Plan to read:

*"Wind energy developments will meet the following specific requirements that:
4. Turbines are 10 rotor diameters from residential properties and 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, and..."

759: Amend Policy R7 as suggested and include reference to the development of the Aberdeen Hydrogen Hub.

Policy R8 – Heat Networks

717: The Aberdeen Planning Guidance and Heat Networks must be provided in advance of the Examination. The requirement for heat networks for major development and masterplans should be deleted.

888: The respondent advises the following amendment to paragraph 8.17: *“Where a new development connects to an existing heat network or provides a new network it will be deemed to have met the energy efficiency requirements of Policy R6: Low and Zero Carbon Buildings, and Water Efficiency”*.

891: Policy should be re-written as follows:

~~“Major Developments and masterplan sites~~ Large scale, strategic developments in the Local Development Plan will be required to:

- (a) connect to an existing network where available, or
- (b) provide within the site an independent Heating/Cooling network and plant capable of connecting to the network at a future date;

~~Unless where it can be proven that connection to an existing network and the provision of an independent heat network are financially unviable, a network of soft routes will be provided through the development for the future provision of a heat network. In such cases an agreed network design will be required”~~

891: With regard to City Centre sites, the following caveat should be added under the respective criteria:

“Unless it can be proven that connection to an existing network or installation of plant capable of future connection are financially unviable.”

897: The Policy should be modified as follows:

~~“Major Developments and masterplan sites~~ Large scale, strategic developments in the Local Development Plan will be required to:

- (a) connect to an existing network where available, or
- (b) provide within the site an independent Heating/Cooling network and plant capable of connecting to the network at a future date; Unless (c)

~~where it can be proven that connection to an existing network and the provision of an independent heat network are financially unviable, a network of soft routes will be provided through the development for the future provision of a heat network. In such cases an agreed network design will be required”~~

897: The Policy should be modified as follows:

“The location and scale of proposed development will determine the heat network approach. Developments within the City Centre and/or within an identified heat network zone will be required to:

- (a) connect to an existing heat network where available, or

(b) provide within the site an independent network and plant capable of connecting to the wider network at a future date, or
(c) provide a Heating/Cooling system within any buildings capable of connecting to the wider network at a future date, or
(d) heat and cool the building or development site through a renewable form of energy produced on site.

Unless it can be proven that connection to an existing network or installation of plant capable of future connection are financially unviable, or in the case of (b), (c) and (d) a detailed feasibility report will be required explaining why connection to the wider network is not possible. This will include evidence of discussions with the network operator, and engineering specifications showing compatibility of the proposed system with the network, or written confirmation that this will be provided."

900: Policy H8 should be modified to state: "Should the Council not seek to consult further on the locations where heat network connections are required then the policy should be removed from the Local Development Plan."

Summary of responses (including reasons) by planning authority:

Policy R6 - Low and Zero Carbon Buildings and Water Efficiency

Support for the Importance of Addressing Climate Change

717, 891, 897, 959 The support and acknowledgement of the importance of addressing climate change is welcomed.

Policy Approach from Extant Local Development Plan 2017 should be Carried Over

959: The suggestion of carrying the policy forward from the extant Local Development Plan 2017 was considered, however the issue of the complexity of the Policy was raised at the Examination into the extant Local Development Plan 2017 (Issue XX - CDXX). While our approach was supported, the approach taken in the Proposed Local Development Plan is designed to align more closely to the existing Building Standards process, and thereby reduce the complexity.

Issue Should be Addressed through Building Standards

717, 891, 897, 900, 959: This issue was considered in the Report of Examination to the extant Local Development Plan 2017 (CDXX) and the Report of Examination to the Local Development Plan 2012 (CDXX) and the approach taken was deemed to be appropriate. The Climate Change (Scotland) Act 2009 (CDXX) is clear on the requirements set for Local Authorities in relation to Low and Zero Carbon Generating Technologies. In 2019 the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (CDXX) and the Planning (Scotland) Act 2019 (CDXX) were introduced, and the requirements on Local Development Plans set out in Section 72 of the Climate Change (Scotland) Act 2009 were not altered, thus showing the Scottish Government's continued commitment to the Policy position.

Fabric First Approach

891: This issue was considered in the Report of Examination to the extant Local Development Plan 2017 (CDXX) and the approach taken was deemed to be appropriate.

While the Proposed Local Development Plan is clear in the requirement to provide low and zero carbon generating technology, and this will also be carried forward into the supporting Aberdeen Planning Guidance, as was the case in the Supplementary Guidance: Resources for New Developments (CDXX) to the extant Local Development Plan 2017 (CDXX), a Fabric First approach will still be supported if better performance can be reached through that approach. This option remains in line with Scottish Planning Policy (CDXX) and Section 44 of the Climate Change (Scotland) Act 2009 (CDXX), which requires that public bodies must act in the way best calculated to help deliver statutory adaptation programmes and will be addressed in the supporting Aberdeen Planning Guidance which will be developed in conjunction with stakeholders and subject to public consultation. There is no requirement to modify the Proposed Policy text.

Use of Aberdeen Planning Guidance

717, 900, 959: Planning Circular 6/2013: Development Planning (CDXX) notes that Local Development Plans should have a focus on Vision, the Spatial Strategy, overarching and other key policies and proposals. The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in non-statutory Aberdeen Planning Guidance. However, the Proposed Local Development Plan provides details of some of the issues which will be covered by Aberdeen Planning Guidance underneath the corresponding policy.

Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no locus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that stakeholders will be able to comment at the appropriate level of detail. Planning Circular 6/2013: Development Planning (CDXX) outlines the benefit of non-statutory guidance is that it can be updated quickly to take account of any issues which arises during the life cycle of the Plan. Although non-statutory guidance will not form part of the Development Plan, when adopted it will be a material consideration in decision making.

Water Efficiency

897, 891: This issue was considered in the Report of Examination to the extant Local Development Plan 2017 (CDXX – Issue XX) and the approach taken by the Council was deemed to be appropriate by the Reporter at that time. Paragraph 8.13 of the Proposed Local Development Plan notes that the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) continues to identify water abstraction from the River Dee as a significant challenge for development across the Region. It identifies that increasing water efficiency is vital to reducing pressures on the River Dee Special Area of Conservation. The Proposed Policy within this Plan, as with earlier Plans, aims to manage the impact on the abstraction levels to ensure development may continue.

888: The support for heat networks within the Proposed Policy is aimed at encouraging the expansion of the existing heat networks across the city and development of new networks in appropriate locations. Where a developer connects to an existing network, or develops a new network, the Policy is aimed at supporting that decision by acknowledging that the development has satisfied the Policy in terms of energy requirements, and this will be set out in the supporting Aberdeen Planning Guidance. For the purpose of clarity,

the wording of paragraph 8.17 could be altered to read “*Where a new development connects to an existing heat network or provides a new network it will be deemed to have met the energy requirements of Policy R6: Low and Zero Carbon Buildings, and Water Efficiency.*”

Existing Stock

959: The assertion that new developments are more efficient than the existing building stock is not refuted, however the policies within the Proposed Local Development Plan only apply to buildings where planning permission is required, and can then only be applied proportionately. As such the suggestion that the focus should be on improving the existing building stock is not refuted as a concept, its relevance to the Proposed Local Development Plan however, is. The suggestion would be more appropriately made to the Scottish Government as part of a wider discussion on climate change.

Policy R7 Renewable and Low Carbon Energy Developments

Support for the Policy

788: Support for Proposed Policy R7 is welcomed.

Pipeline Consultations

730: This issue was considered in the Report of Examination into the extant Local Development Plan 2017 (CDXX) and the approach taken was deemed to be appropriate. Consultation on the impact of all relevant development on pipelines is considered through the preapplication and planning application process as set out in Proposed Policy B6: Pipelines, Major Hazards and Explosive Storage Sites, of the Proposed Local Development Plan. The Pipeline Consultation Zones are also shown on the Additional City Wide Proposals Map (Constraints Map) of the Proposed Local Development Plan (CDXX). The suggestion that wind turbine development should be specifically identified as having to consult in relation to proximity to Pipeline Consultation Zones is not supported. It would not be appropriate to single out one form of development and thereby suggesting that other forms of development may not be required to consult. There is no requirement to modify the Proposed Policy text.

759: The importance of hydrogen as an alternative fuel source is recognised by the Planning Authority and, where appropriate, will be supported by Proposed Policy R7: Renewable and Low Carbon Energy Developments. The suggestion that the hydrogen developments noted in the submission should be included in the Proposed Local Development Plan is not supported. The developments in question are now complete and their status is recognised through their individual planning consents. In relation to the existing hydrogen vehicle fleet in Aberdeen, this is not directly relevant to the Proposed Local Development Plan as it is not directly a land use. Its identification would therefore be inappropriate for a land use plan.

Technical Aspects for Wind Turbine Developments

1143: The suggestion within the submission that other technical aspects of Wind Turbine Developments, such as different forms of turbines and other elements of windfarm developments, should be considered is accepted. All elements of such development will be considered as part of any pre-application and planning application process.

In line with Planning Circular 6/2013: Development Planning the Proposed Local Development Plan sets out the key policy position and the supporting Aberdeen Planning Guidance will set out more specific technical detail.

Policy R8 – Heat Networks

Use of Aberdeen Planning Guidance

717, 891, 897, 900, 959: Planning Circular 6/2013: Development Planning (CDXX) notes that Local Development Plans should have a focus on Vision, the Spatial Strategy, overarching and other key policies and proposals. The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in non-statutory Aberdeen Planning Guidance. However, the Proposed Local Development Plan provides details of some of the issues which will be covered by Aberdeen Planning Guidance underneath the corresponding policy.

Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no locus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that stakeholders will be able to comment at the appropriate level of detail. Planning Circular 6/2013: Development Planning (CDXX) outlines the benefit of non-statutory guidance is that it can be updated quickly to take account of any issues which arises during the life cycle of the Plan. Although non-statutory guidance will not form part of the Development Plan, when adopted it will be a material consideration in decision making.

Scale of Development

717, 891, 897: It is recognised that within the City there is a broad and diverse range of developments which come forward and Proposed Policy R8 reflects that. The concern raised over thresholds within the Policy, specifically the reference to Major Developments (50 homes) is noted, however development of that scale presents opportunities to support the development and growth of the existing heat networks across the City. Scottish Planning Policy (CDXX) is clear in paragraph 159 that “*Local development plans should support the development of heat networks in as many locations as possible*”. To omit developments of 50 homes for examining the possibility of supporting or delivering a network would be contrary to this, particular in the context of the recommendation from the United Kingdom’s Climate Change Committee that zero-emission heating in new builds should be enforced from 2025 at the latest (CDXX). The Scottish Government’s commitment to ensuring that, from 2024, new buildings must use heating systems which produce zero direct emissions at the point of use is outlined in the scoping consultation on the New Build Heat Standard (CDXX), this could lead to a ban on traditional methods of heating such as gas boilers in new builds by 2024, within the lifetime of this Proposed Local Development Plan.

The Proposed Policy nevertheless recognises that this solution will not always be possible and is clear that in instances where connection to, or development of, a network is not possible, this can be put forward as part of the application. The Policy presents a range of options based on geographic location, type of development and expected heat demand

which can all be considered as part of the process. These will be further expanded upon in Aberdeen Planning Guidance to provide more detail.

Development Viability

891, 897, 900: Concerns over the impact of heat networks on viability are noted. The Heat Networks (Scotland) Act 2021 (CDXX) received Royal Assent on 30 March 2021 and makes provision for regulating the supply of thermal energy by a heat network, and for regulating the construction and operation of a heat network; to make provision about the powers of persons holding a heat networks licence; to make provision about conferring rights in heat network assets where a person ceases operating a heat network; to set targets relating to the supply of thermal energy by heat networks; to make provision about plans relating to increased use of heat networks; and for connected purposes. Proposed Policy R8 makes it clear that where implementing the Policy threatens the viability of the development, a viability assessment may be provided to the Planning Authority to support that position.

Water efficiency

888: See comment under Proposed Policy R6 above.

General

504: Suggestion of the important of developments being energy efficient is recognised and welcomed.

768: Support is noted and welcomed.

Reporter's conclusions:

Reporter's recommendations:

Issue 29	POLICIES H3 AND H4: MEETING HOUSING AND COMMUNITY NEEDS	
Development plan reference:	Pages 76 - 77	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Dandara (711) Stewart Milne Homes (717) Cults, Bieldside and Milltimber Community Council (833) Scottish Government (885) NatureScot (888) Barratt North Scotland (891) Homes for Scotland (897) CALA Homes (North) Ltd (900) Colin McFadyen (924)</p>		
Provision of the development plan to which the issue relates:	Support residential development with appropriate density, and housing mix	
Planning authority's summary of the representation(s):		
<p><u>Policy H3 – Density</u></p> <p>711: The respondent supports the efficient use of land and agrees that higher densities are appropriate in areas with good public transport. However, applying a general approach to density requirements will restrict developers from delivering a range and variety of homes. Developers will be forced to deliver a product that may not be demanded by the market and sites will only be suitable for slim dwellings or flatted properties. The respondent asserts that the adoption of high minimum densities is contrary to Scottish Planning Policy 2014. The respondent considers that land should be efficiently used, however each site should be considered on its own merits and characteristics resulting in densities changing site to site. Delivery of a mix of dwellings per Policy H4 would be challenging should the Proposed Local Development Plan rigidly enforce minimum densities. Policy should be flexible to allow site by site approach to ensure provision of high-quality place.</p> <p>833: The respondent refers to paragraph 9.3 of Policy H3 – Density of the Proposed Local Development Plan and notes the need to get best value from housing development land. However, the Proposed Local Development Plan is not consistent with the Aberdeen City and Shire Strategic Development Plan 2020 and the Proposed Local Development Plan wording should be aligned with the Strategic Development Plan. The Aberdeen City and Shire Strategic Development Plan 2020 states generally no less than 50 dwellings per hectare, however the Proposed Local Development Plan states a minimum of 50 dwellings per hectare. The respondent struggles to see how this density can be achieved without large proportion of flatted developments which would not be suited to Lower Deeside. Historical proposals have been below previous target of 30 homes per hectare. The respondent welcomes smaller and affordable homes however applying the density would</p>		

likely constitute over-development if existing plot ratio guidance of 33% is to be maintained. The respondent provides an example of house types in Countesswells.

Respondents 891, 897 and 900 refer to the Aberdeen City and Shire Strategic Development Plan 2020's density requirements of 30 dwellings per hectare (dpha) on sites over 1 hectare in a Strategic Growth Areas. In Aberdeen City *"this target should increase to generally no less than 50 dpha"*. The respondents assert that Policy H3 is more restrictive in its density requirements in that higher densities are expected above this in the City Centre, in and around town centres, public transport nodes and on brownfield Sites. The respondents assert that Policy H3 Density is more restrictive than what the Aberdeen City and Shire Strategic Development Plan 2020 requires and 50 dwellings per hectare is a significant increase to the previous policy.

The respondents consider such requirements in the current wording are unreasonable and conflicting with other requirements, elsewhere in the Proposed Local Development Plan. Such wording placing emphasis on density may compromise provision of amenity space, green and blue infrastructure, provision of homeworking space and parking standards. The respondents consider that the surrounding context, which is often lower density, should also be a consideration. The sentence should be removed, and the Proposed Local Development Plan Policy should echo the Aberdeen City and Shire Strategic Development Plan 2020 requirement.

In areas where a higher density is appropriate and desired the market will dictate this. Artificially increasing density is unlikely to result in higher density development, rather it will increase the number of unviable and vacant development sites.

Policy H4 - Housing Mix and Need: Masterplan Requirements

711: Building Standards and other Local Development Plan Policy requirements are considered sufficient to ensure that new dwellings meet the needs of a variety of people. The respondent notes focus on ageing population and considers wording should reflect needs of entire population rather than specific parts of it.

717: The future adaptability of properties is required by Building Standards. This is a duplication of policy.

711, 891, 897: The focus of the Local Development Plan should be on addressing Policy principles set out in Scottish Planning Policy; such as a generous supply of land across all tenures with a five year effective supply. The Council should ensure sufficient land has been allocated through the Proposed Local Development Plan to allow development industry to provide a mix of housing required if it is believed that a specific part of the population is not being catered for. The Proposed Local Development Plan should allow the development industry to provide the mix of housing required (as led by the market), not place a blanket policy stipulation across all sites. If there is no demand for a particular product it would be unsustainable for the industry to provide it.

711, 897: The extant Local Development Plan does not specify a requirement for Masterplans for developments of more than 50 units and it is not considered an appropriate means to fix housing mix. It is unnecessary to introduce it through Policy H4 to secure a housing mix. If a certain sector of the population is not being catered for, the Local Development Plan needs to be ensuring sufficient land allocation to allow the development industry to provide the mix of housing required. The respondent refers to

single bedroom market homes and that they may not be appropriate on all sites, particularly those in less central locations. Therefore, greater flexibility to respond to context and the market is necessary in this regard

924: The respondent considers there needs to be a mix of housing required, such as bungalows and less town houses.

Masterplan Requirements

711, 891, 897, 900: In reference to Policy H4 - Housing Mix and Need, while noting the Policy has been rolled forward from the extant Local Development Plan 2017, consider it inappropriate for the Policy to specify that developments over 50 homes/major development sites are required to provide 1- and 2-bedroom units. The respondents interpret the policy to require 1 and 2 bedroom units across all areas of the City. The respondents consider that housing mix should be delivered by the market as they are best placed and it is in their own interests to understand demand which should not be dictated by Policy. The respondents expand that housing supply is adaptive and can change to customer demand and that this changes over time. The respondents consider that such requirements will lead to conflict between the development industry, Council, and the community.

897: The respondent questions the requirement for Masterplans given it does not appear elsewhere as a requirement in the Proposed Local Development Plan and does not consider it an appropriate means to fix housing mix. The respondent refers to single bedroom market homes and that they may not be appropriate on all sites, particularly those in less central locations. Therefore, greater flexibility to respond to context and the market is necessary in this regard.

888: in reference to Policy H4: Housing Mix and Need the respondent notes that thresholds for masterplanning are expressed on the Council's website – i.e. "*Masterplans will be developed for residential sites with an area over 2 hectares or 50 houses or more, for sites identified in the Local Development Plan, or other large scale sites deemed appropriate.*" Paragraph 9.7 and Policy H4 Housing Mix and Need states this threshold in terms of number of homes, but not in terms of area. The respondent suggests that it would be helpful to do both.

891: The requirement for a Masterplan is not stipulated elsewhere in the Proposed Local Development Plan. The respondent does not consider that a reference to it should be included in this Policy. As Masterplans deal with high level design issues rather than fixing specific housing mix.

Need for Specific Groups

711: The Affordable Housing Policy should be used to accommodate a shortfall of homes for older people and people with particular needs. If a particular need is identified in a specific area, the Council could identify a specified site to meet this.

885: The respondent refers to page 77, paragraph 9.10 of the Proposed Local Development Plan and suggests greater clarity is required around terminology "older people".

891: The respondent considers that should a particular need arise for 1- and 2-bedroom homes then the Council should consider identifying specific opportunity sites for the provision of such accommodation.

Modifications sought by those submitting representations:

Policy H3 – Density

717: Add wording to Policy H3 *"there may be instances where densities of 50 units per hectare are not appropriate and in those circumstances lower densities will be supported."*

833: The wording of paragraph 9.3 and Policy H3 of the Proposed Local Development Plan should be aligned with the Aberdeen City and Shire Strategic Development Plan 2020.

891 Policy H3 – Density should be modified to delete the following wording: *"Higher densities are expected within the city centre, in and around town centres, public transport nodes and on brownfield sites"*.

897: The respondent requests that sentence *"Higher densities are expected within the city centre, in and around town centres, public transport nodes and on brownfield sites"* be removed and the policy to reflect the intentions of the Aberdeen City and Shire Strategic Development Plan 2020.

900: The respondent requests that Policy H3 - Density should be modified so that the Planning Authority should seek to identify greater clarity on densities and the balance between competing planning objectives. This may alter spatially but will provide for greater clarity to developers and the public.

Policy H4 – Housing Mix

711: The respondent requests remove requirement for sites over 50 dwellings to provide 1 and 2 bedroom units in both market and affordable housing contributions. Remove emphasis on needs of ageing population from Supporting Text. Delete reference to the need for a Masterplan for housing development over 50 units, with consequential changes to paragraph 9.7. Delete the requirement for 1 and 2 bedroomed units for both market and affordable housing. Delete paragraphs 9.8-9.10 to remove overemphasis on an aging population.

888: The respondent recommends that paragraph 9.3 and Policy H4 express the Council's thresholds for requiring Masterplans in terms of area as well as number of homes

891: Concern over the wording of Policy H4. The reference within the first sentence *"in line with a masterplan"*, should be removed. Reference to the provision of 1 and 2 bedroom units in both market and affordable housing contributions should be removed from the final sentence of the first paragraph or at the very least changed to 1 OR 2 bed.

897: The respondent requests that Policy H4 should be amended as follows *"Housing developments of larger than 50 units are required to achieve an appropriate mix of dwelling types and sizes. This mix should include smaller 1 or 2 bedroom units and should be reflected in both the market and affordable housing contributions."*

An appropriate housing mix is expected in housing developments to reflect the diverse housing need in the area; this includes older people and disabled people. Where possible, housing units should demonstrate a design with accessibility and future adaptability in mind. For smaller developments (fewer than 50 units), a suitable mix of dwelling types and tenure will be provided in the interests of placemaking”.

900: The respondent requests that Policy H4 Housing Mix should be modified to remove the requirement for inclusion of 1 and 2 bedroom units for major Developments. Wording of the policies should be modified to state *“Housing developments of larger than 50 units are required to achieve an appropriate mix of dwelling types and sizes, taking into consideration the needs and demand of the area and local area and the conclusions of the Housing Need and Demand Assessment”.*

Summary of responses (including reasons) by planning authority:

Policy H3 – Density

711, 833: Land is an extremely important and valuable resource and its efficient use is fundamental to a Plan-led planning system and our sustainable future. Higher density developments prevent the loss of valuable agricultural land, green space, habitats, the need for travel, can reduce infrastructure costs and make transportation routes more viable. They can also support the viability of business by providing additional footfall and support the provision of services within new communities. The critical mass of development enables the delivery and maintenance of services and infrastructure and is a commonly understood benefit of higher density communities. If we are to develop twenty-minute neighbourhoods as is encouraged in the National Planning Framework 4 autumn statement (CD XX) then higher density communities will be required to achieve this.

The efficient use of land is highlighted in paragraph 40 of Scottish Planning Policy 2020 (CD XX) where it notes that *“planning should direct the right development to the right place”* and higher density development can support the creation of better places. It also notes that higher density development supports the principles of a low carbon place by reducing transport emissions in paragraph 158 and can help the delivery of heat networks. The latter is again encouraged in the National Planning Framework 4 autumn statement (CD XX) and is further supported through the legislative framework of the Heat Networks (Scotland) Act 2021 was passed in parliament on 23 February 2021 and received Royal Assent on 30 March 2021.

At each tier of the Plan-led system the efficient use of land is promoted. The Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) reiterates the need to efficiently use land in order to deliver sustainable development.

- Paragraph 4.1 states that to achieve the Plan’s overall Vision *“we must set the highest standards for placemaking, urban and rural design, promote a mix of land uses, use land more efficiently, and prioritise the re-use of previously developed land and protect existing habitats”.*
- Paragraph 4.8 states *“Land brought forward for housing must be used efficiently, and brownfield sites and regeneration areas should be given priority”.*
- Under targets on page 27 it is stated *“For at least 40% of all new housing in Aberdeen City to be on brownfield sites”.*

Given that the Proposed Local Development Plan has aligned its Spatial Strategy to meet the Targets of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) and place a greater emphasis on the use of brownfield sites, an increased level of density to the extant Local Development Plan 2017 (CD XX) is appropriate. The Brownfield Urban Capacity Study 2019 (CD XX) sets out the sites which can accommodate the delivery of the Local Development Plan Housing Allowances of Table 3 of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX). The allocation of these brownfield sites in the Proposed Local Development Plan and their anticipated levels of delivery of new homes is in line with the density requirements of the Proposed Local Development Plan under Policy H3 - Density. To reduce the requirement would be incongruous with the Vision and Targets of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX), Scottish Planning Policy 2020 (CD XX) and the Spatial Strategy of the Proposed Local Development Plan.

891, 897, 900: The respondents assert that it will be challenging to meet the requirements of Proposed Policy H4 – Housing Mix and the requirements of other Policies in the Proposed Local Development Plan, namely the density requirements of Proposed Policy H3, as they have conflicting interests. In terms of the weight to be applied to each Policy, there is commitment to all the Policies, with the need for an integrated approach to the delivery of the Proposed Local Development Plan’s Vision. The Policies carry equal weight and importance and need to be taken into account in the decision-making process. Balancing often conflicting interests in different situations is a large part of the planning process.

Paragraph 9.5 of the Proposed Local Development Plan recognises achieving such density levels must be done while having due regard to the character of the site and the importance of creating attractive residential environments. In terms of the wording of Proposed Policy H3 – Density not reflecting that of the Aberdeen City and Shire Strategic Development Plan 2020, it is considered a matter of semantics. The Aberdeen City and Shire Strategic Development Plan 2020 states a density requirement for sites over one hectare *“In the Aberdeen City Strategic Growth Area this target should increase to generally no less than 50 dwellings per hectare”* and the Proposed Local Development Plan states *“For all residential developments over one hectare, the net density of new development is generally sought at no less than 50 dwellings per hectare”*. By providing a minimum density the Proposed Local Development Plan provides clear guidance to prospective developers of what is expected from each site. The respondents state that the market is best suited to determine the density of development. There is agency within the Proposed Policy that a mix of new home size and types can be accommodated through innovative schemes which can respond to market demands. Such agency complements rather than conflicts with Housing Mix.

Policy H4 - Housing Mix and Need: Masterplan Requirements

711: Building Standards is a separate but complementary process to ensure quality and standards in the built environment. Building Standards, while a regulatory process, does not have a remit to influence the mix of a development and, in terms of process alignment, comes after the planning process. In order to ensure a mix of housing types is provided, the planning process and use of a policy framework is required. The Proposed Local Development Plan rightly reflects the evidence of the Housing Need and Demand Assessment 2017 (CD XX) and the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) and therefore refers to the needs of specific groups.

717: As stated above, Building Standards is a separate but complementary process to ensure quality and standards in the built environment. Greater adaptability of housing stock offers many benefits. We want to ensure a longer-term mix with homes that can be adopted to cater for different needs and with the additional benefit of using existing homes to future proof need and increase the efficient use of land. It is therefore appropriate to include reference to adaptability of homes in Proposed Policy H4.

711, 891, 897: The Housing Need and Demand Assessment 2017 (CD XX) has evidenced that there is need to provide a mix of housing types. Paragraph 120 Scottish Planning Policy 2020 (CD XX) states that Local Development Plans should “*should allocate a range of sites*”. The Proposed Local Development Plan acknowledges the need established in the Housing Need and Demand Assessment 2017 (CD XX) and a substantial mix of housing sites has been achieved through the Proposed Local Development Plan’s Spatial Strategy and historic large-scale allocations.

Paragraph 4.7 of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) states “*Communities must be mixed in terms of the type and size of homes, as well as tenure and cost*”. A mix of housing types is as much a valid market consideration as it is a consideration for those delivering affordable homes. And such a mix relates to all cohorts of house buyers or those who need additional support with housing. While the market will indeed accommodate the demands of certain sections of society there is also the need and responsibility to ensure adequate provision of a mix that meets the need of other sections of society and this must be addressed through both the market and affordable sectors. The demand for such mix is clearly evidenced in the Housing Need and Demand Assessment 2017 (CD XX) and required by the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX). If the need for such requirements were not included in Proposed Policy H4 then the Proposed Local Development Plan would not align with the statutory requirements of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX).

Aside from the above, Proposed Policy H4 – Housing Mix has been an established part of the Local Development Plan since the Local Development Plan 2012 (CD XX). The requirement for mix is included in Policy H4 in the extant Local Development Plan 2017 (CD XX) and is further refined and updated in the Proposed Local Development Plan.

711, 897: The requirement for a Masterplan for developments of more than 50 homes has been carried forward from the extant Local Development Plan 2017 (CD XX). Therefore, the principle of this requirement has been already established. In the Local Development Plan 2012 (CD XX) Policy H4 developments of more than 50 homes were required to achieve an appropriate mix in line with a Masterplan. Such a requirement is not new or onerous on those submitting development proposals.

The population of Scotland is continuing to age with the group over 65 expected to be one of the fastest growing age groups. The Aberdeen City and Shire Housing Needs and Demand Assessment 2017 (CD XX) identified that this group will grow faster than other cohorts over the life of the Proposed Local Development Plan. Nationally, the percentage of the population over age 65 is one of the fastest growing age groups. Paragraph 132 of Scottish Planning Policy 2020 (CD XX) states that where a demand is identified through Housing Need and Demand Assessment 2017 (CD XX), policies should be put in place to mitigate for this change through the provision of suitable housing. The Housing Need and Demand Assessment 2017 (CD XX) finds that the between 2014-2039, the percentage

growth rate of those aged 65-68 years is 20%. The increase in those aged 75+ is around 65%. Catering for this age group is therefore extremely important as it is the decisions we take now that will inform the period 2022 to 2032. Additionally, the Housing Need and Demand Assessment 2017 (CD XX) identified particular need amongst single person homes (need for 1 and 2 bed) so the need and demand for such is evidenced. The Housing Need and Demand Assessment has been certified as robust and credible by the Centre for Housing Market Analysis (CDXX) and therefore Proposed Policy H4 - Housing Mix and Need: Masterplan Requirements is informed by a detailed and validated evidence base.

The Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) reflects this and requires new developments to meet the needs of the entire community. Paragraph 4.5 states *“With an ageing population and smaller households, new development should also meet the changing needs of society over its whole life and give regard to greater mix, size and types of new homes”*.

Proposed Policy H4 does not set a prescribed mix - it simply requires that all developments over 50 homes provide a mix of types including smaller one- and two-bedroom units. These are seen as particularly important as they satisfy two ends of the market. They provide an opportunity for young families to get started in the housing market and allow older people to downsize. By not setting a prescribed target the Proposed Policy provides the flexibility for the Masterplanning/planning application process to adapt to market trends. This supports Scottish Planning Policy’s aim of supporting the creation of sustainable mixed communities. Where sites are brought forward for specialist housing which is specifically identified for one user group, such as housing for the elderly or student accommodation, the appropriateness of applying the Proposed Policy will clearly be considered as part of the determination of the application. The Proposed Policy is also carried forward the extant Local Development Plan 2017 which established requirement to provide a mix of types including smaller one and two bedroom units.

Scottish Planning Policy does not determine what a community is, as setting a ‘one size fits all’ definition to community would be impractical and even counterproductive. Regardless of what a community is considered to be, it is the aim of this Proposed Policy to provide a range of housing types in all developments over 50 homes, as it is these developments which together or alone will build to form a community. The Proposed Policy provides the flexibility for the Masterplan or planning application to consider context when determining the appropriate level of mix. However, the Housing Need and Demand Assessment 2017 (CDXX) has shown a strong demand for all house types meaning that regardless of what scale is chosen, there will still be a demand for a range of house types and sizes.

924: The need for a mix of housing types is explicitly acknowledged in the Proposed Local Development Plan and Proposed Policy H4.

891: The requirement for a Masterplan does not need to be stated elsewhere in the Proposed Local Development Plan. Policies by their very nature deal with specific component of development and therefore do not always need to be cross referenced. The Proposed Local Development Plan is read as a whole and the requirement for a Masterplan has been established through previously Examined and approved Local Development Plans.

Need for Specific Groups

711: The need to provide homes for specific groups comes from robust and credible evidence from the Housing Need and Demand Assessment 2017 (CD XX) as has been stated above. The requirement to address the provision of this need through a mix of housing types has also been addressed in detail in the Council’s response to Mix and Masterplan requirements.

It is not appropriate, as the respondent asserts, that it be the sole responsibility of those delivering affordable homes to provide a mix of housing types for older people. It is clearly set out through the tiers of the planning system that a range and mix of house types, both market and affordable, are required to meet housing need. The delivery of such is correctly supported through the policy context of Proposed Policy H4 – Housing Mix and Need: Masterplan Requirements

885: The term ‘older people’ refers to people aged 60 or over.

891: The respondent suggests that the Council should identify specific sites for the location of 1 to 2-bedroom homes. This would seem overly prescriptive and contrary to what many submissions, on behalf of the development industry have asked for, that the market should be given flexibility to determine the mix of a development.

Proposed Policy H4 is a nudge towards the provision of a mix of housing types. It gives those submitting proposals policy security and awareness of the requirement to provide mix at the time of developing a scheme. It also offers agency to determine the components of that mix.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 30	POLICIES H5, H6, H7 AND H8: AFFORDABLE HOUSING, GYPSY AND TRAVELLER SITES, STUDENT ACCOMMODATION AND HOUSES IN MULTIPLE OCCUPATION	
Development plan reference:	Pages 77 - 81	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>0555: The University of Aberdeen 0650: Old Aberdeen Community Council 0711: Dandara 0717: Stewart Milne Homes 0833: Cults, Bieldside and Milltimber Community Council 0836: Old Aberdeen Heritage Society 0843: Castlehill and Pittodrie Community Council 0854: Cove and Altens Community Council 0885: Scottish Government 0891: Barratt North Scotland 0897: Homes for Scotland 0900: CALA Homes (North) Ltd 1135: Froghall Powis and Sunnybank Community Council</p>		
Provision of the development plan to which the issue relates:	Requirement for the provision of affordable housing, and Gypsy and Traveller Sites; criteria for Student Accommodation and Houses in Multiple Occupation	
Planning authority's summary of the representation(s):		
<p><u>Policy H5 - Affordable and Social Housing – General</u></p> <p>843: Welcome and strongly support the priority for affordable housing and social housing. There is a need for affordable and socially accessible housing for a wide demographic in Aberdeen.</p> <p>885: The respondent considers that Section 9, page 78, of the Proposed Local Development Plan relating to Affordable Housing could be improved through setting out the scale and distribution of affordable housing which would bring the Proposed Local Development Plan in line with paragraph 128 of Scottish Planning Policy.</p> <p>891: Respondent generally agrees with the Proposed Local Development Plan approach to carry forward Policy H5 from the extant Local Development Plan 2017. The wording of the Policy should however be amended to align with Scottish Planning Policy and provide sufficient flexibility for a reduction in exceptional circumstances.</p> <p><u>Policy H5 - Affordable Housing – conformity with Scottish Planning Policy</u></p> <p>711, 897: The respondents consider that Policy H5 Affordable Housing should be amended to reflect the requirements of Scottish Planning Policy 2014. The respondent quotes Scottish Planning Policy paragraph 129 which states “<i>level of affordable housing</i></p>		

required as a contribution within a market site should generally be no more than 25% of the total number of houses” and also refers to the Aberdeen City and Shire Strategic Development Plan 2020 which states the following “For new housing to meet the needs of the whole community by providing appropriate levels of affordable housing (generally no more than 25%) and an appropriate mix of types and sizes of homes”. The Policy’s current wording imposes a minimum requirement across the City and does not provide flexibility for reduction in exceptional circumstances. The use of the term “no less than” is not acceptable and is a subtle but important difference from Scottish Planning Policy. If development is stifled by requirements of Policy, it benefits neither the development industry or Planning Authority as affordable housing provision is dependent on delivery of mainstream housing. Consideration needs to be given to economic climate in formulating Policy and negotiating the level of on-site provision. Development must remain viable and a flexible approach is necessary to the provision of affordable housing.

Offsite Provision and Commuted Sums

717, 891: There requires to be greater flexibility in approach to delivery, and this should be clearly articulated within the Proposed Local Development Plan. The provision of affordable housing continues to rely too heavily on the delivery of mainstream housing from the development industry, with the onus placed on landowners to make land available for development.

The statement contained within the current Proposed Local Development Plan which advocates a ‘flexible approach’ from the Council to ensure the ‘maximum provision of affordable housing’ should be carried forward into the next Plan.

The Proposed Local Development Plan should also seek to be more pro-active in terms of identifying and allocating specific sites for affordable housing, as per Planning Advice Note 2/2010: Affordable Housing and Land Audits with regard to alternative means of delivering affordable housing.

The Proposed Local Development Plan should be pro-active and allocate specific sites for affordable housing along with the method of delivery. Planning Advice Note 2/2010: Affordable Housing and Land Audits promotes other means of delivering affordable housing, including allocating sites and off-site provision, and Aberdeen City Council should take a proactive approach reflected through the Local Development Plan. Greater flexibility should be permitted to on-site and off-site delivery of affordable housing in line with Scottish Planning Policy and Planning Advice Note 2/2010: Affordable Housing and Land Audits. A wider acceptance of, and flexible approach to, commuted sums and off site delivery is suggested in line with Planning Advice Note 2/2010: Affordable Housing and Land Audits - they can play important part in delivery of affordable housing and catalyst to enable delivery on sites (including sites owned by Council or an Registered Social Landlord). It is not always viable to provide affordable housing on-site - developers have experienced Registered Social Landlords declining interest in site due to Council Tax and factoring costs (which are outwith the developers control) or no funding has been available to enable them to take up transfer of serviced land.

Any review of the existing commuted sums figures and the low-cost home ownership benchmark should be undertaken in consultation with the development industry and through the Development Plan process. Any figure used should be for the duration of the Plan and not be subject to further increases, without a full and informed consultation with

the housebuilding industry. The existing benchmark figures need to be reviewed to reflect a continuing surge in build costs, infrastructure contributions and developer obligations.

Off-site provision should be viewed as acceptable as onsite provision and it is asserted are not ruled out by Scottish Planning Policy. Off-site provision and commuted sums can play a vital role in the delivery of affordable housing, acting as a catalyst for delivery on specific sites. There should be a wider acceptance of the benefit of all forms of affordable housing delivery mechanisms. The key is the delivery of affordable housing in areas of need.

Threshold for Affordable Housing

897: The respondent considers that the threshold for providing affordable homes should be raised to at least 12 units to support smaller builders. The respondent refers to work they have undertaken, Small Scale Home Builders Report: Increasing Supply (November 2019), which argues for such an increase. The respondent highlights that Covid-19 has compounded the recovery of small to medium house builders since the 2008/2009 recession. It is reiterated that supporting small businesses help to create jobs.

900: The respondent considers the change in word of Policy H5 Affordable Housing to that of the extant Local Development Plan 2017 places greater emphasis of the provision of affordable housing on site. The respondent asserts monitoring indicates that since the introduction of the extant Policy in the Local Development Plan 2017 the delivery of affordable housing has increased. Housing has been delivered through a range of means and there is no justification for this change in policy.

Policy H5 - Affordable Housing - Aberdeen Planning Guidance

717: The Aberdeen Planning Guidance is not available. It is not possible to comment on the Policy. The document must be published before the Examination so further comment can be made.

891: The respondent notes that further Planning Advice will be forthcoming and is disappointed that this is not yet available for comment. Substantial changes are required to the current Supplementary Guidance. It should be amended to omit the sequential approach which seeks on-site provision as a preference above all other forms. A more flexible approach should be encouraged, to both on-site and off-site provision and the associated range of tenures. There should be greater scope to address the provision of affordable housing through commuted sums, and reference to sub-market areas within the City should be removed entirely. Any review of those sums should be transparent as part of the Proposed Local Development Plan process and subject to appropriate consultation.

900: The further detail referred to in the Policy to be included in non-statutory guidance is not considered appropriate. As such the Policy should be modified.

Policy H7 – Student Accommodation Developments

555: The respondent states that the University makes a significant contribution to the local economy. The respondent further considers the quality of teaching facilities and residential accommodation as important. The respondent broadly supports the Policy and welcomes criteria on accessibility and allowance of redevelopment. It is assumed that relaxation of parking standards will continue to apply. The respondent considers that the statement

"*new proposals will be assessed for relevant developer obligations*" is unnecessary and that this requirement for developer obligations is addressed in Policy I1 Infrastructure Delivery and Planning Obligations. The respondent suggests that their Main Issues Report representation should be considered.

Policy H8 - Houses in Multiple Occupation and Overprovision

555: Objects to inclusion of an overprovision policy. It is ambiguous and provides uncertainty for owners of Houses in Multiple Occupation and the community. Difficult to determine what constitutes overprovision and how this is monitored and determined. The respondent refers to a 2017 Report on the potential for establishing a Houses in Multiple Occupation overprovision policy which recommended against its introduction. The respondent is disappointed that this Policy has been included in the Proposed Local Development Plan when not it was not included in the Main Issues Report as a Preferred Option. The respondent considers that it is unclear how the requirement that "*the number of licensed properties will generally not exceed 12% of the total residential properties within a single Small Data Zone*" is arrived. Percentage impacts could be significantly greater in one area than another. It was suggested at Main Issues Report stage that Ward boundaries should be used as a basis for percentage calculations, and this should be limited to 15%. The respondent suggests their Main Issues Report representation should be considered.

650: The respondent sets out their concerns with the 15% limit of Houses of Multiple Occupation and considers that this should be reduced to 12%. The respondent sets out in a detailed map-based presentation the percentage of Houses of Multiple Occupation across small data sets to illustrate their argument for the reduction in the limit.

833, 836: The respondents consider paragraph 9.25 and Policy H8. The respondent 833 refers to supporting evidence provided by Old Aberdeen Community Council (respondent 650) that the use of Small Data Zones is not sufficient to control over-provision of Houses of Multiple Occupation. The respondents support the recognition that the problem with overprovision of Houses of Multiple Occupation is a localised overprovision and not at an overall City level. The use of small data zones is not supported as this method would still allow localised high concentrations of Houses of Multiple Occupation within small areas and would overwhelm the settled community, impact on residential balance and not promote sustainable mixed communities. The use of Census Output Areas is promoted as an alternative. These would help achieve a balanced, sustainable and mixed community. These are used locally and nationally and are as straightforward to use as small data zones. Using the smaller measure of data would reduce incidence of clusters of high-density Houses of Multiple Occupation and ensure a spread across the City. Reference is made to the Census Output Areas are utilised by Dundee City Council to implement their Houses of Multiple Occupation Overprovision Policy.

854: The respondent supports Old Aberdeen Community Council's proposal to reduce the limit of Houses of Multiple Occupation from 15% to 12%.

1135: The respondent details the impact that a high concentration of Houses of Multiple Occupation has had on the amenity of their residential area. The respondent welcomes Policy H8 but considers that the Policy needs some amendments to strengthen it.

Modifications sought by those submitting representations:

Policy H5 - Affordable Housing

711: The respondent requests that Policy H5 Affordable Housing be modified to remove the term "*no less than*" as it does not reflect Scottish Planning Policy.

717: The respondent requests the modification of Policy H5 to read: "*Housing developments of five homes or more are required to contribute no more than 25% of the total number of homes as affordable housing. Affordable housing requirements will be delivered on-site in many instances. Off-site provision of affordable housing will be considered on a case by case basis. Commuted Payments will be accepted will in circumstances, as set out in the Aberdeen Planning Guidance, where a suitable project has been identified*".

891: The respondent requests the modification of Policy H5 Affordable Housing so that the term "*no less than*" is removed as the wording does not reflect Scottish Planning Policy, which requires generally "*no more than*" (*paragraph 129*). Policy H5 should carry forward the following wording from the extant Local Development Plan 2017: "*to maximise the provision of affordable housing it is the aim of the Council to take a flexible approach to its delivery, with a view to maximising opportunities to achieve the highest levels possible*".

897: The respondent requests the modification of Policy H5 Affordable Housing as follows: "*Housing developments of 12 homes or more are required to contribute no less than 25% of the total number of homes as affordable housing. Affordable housing requirements will be delivered on-site. Off-site provision of affordable housing requirements will only be considered where there is sufficient justification. Commuted Payments will only be accepted in certain circumstances, as set out in the Aberdeen Planning Guidance. Housing development for occupation by 'Key Workers' will be supported in principle, with further advice set out in Aberdeen Planning Guidance*".

900: The respondent requests the modification of Policy H5 Affordable Housing to remove the statement "*Affordable housing requirements will be delivered on-site. Off-site provision of affordable housing requirements will only be considered where there is sufficient justification. Commuted Payments will only be accepted in certain circumstances, as set out in the Aberdeen Planning Guidance*". The Policy should be further modified to amend the Statement "*Housing development for occupation by 'Key Workers' will be supported in principle, with further advice set out in Aberdeen Planning Guidance*". To "*Housing development for occupation by 'Key Workers' will be supported in principle. Further advice on the delivery of affordable housing is set out in Aberdeen Planning Guidance*".

Policy H7 - Student Accommodation Developments

555: The respondent requests the modification of Policy H7 to remove the sentence "*new proposals will be assessed for relevant developer obligations*" from policy.

Policy H8 - Houses in Multiple Occupation and Overprovision

555: The respondent requests that Policy H8 be modified to remove the final paragraph on overprovision. If not acceptable, the limit should be set at 15% over clearly defined and recognisable ward boundaries.

650, 854: The respondent requests that Policy H8 be modified to amend the limit for Houses of Multiple Occupation from 15% to 12%.

836: The respondent requests that Policy H8 be modified to propose a limit of 12% within a single Census Output Area.

Summary of responses (including reasons) by planning authority:

Scale and Distribution of Affordable Housing

885: The suggestion that the Proposed Local Development Plan should set out the scale and distribution of affordable housing is not required as this is addressed in the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX). Table 1 Housing Supply Target by Housing Market Area, Local Authority and Tenure Mix of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) sets out the Housing Supply Target across both the market and affordable sectors. This is set at Council and Housing Market Area level. It is unnecessary to repeat this at a Local Development Plan level. Aberdeen's affordable housing supply targets is informed by the Housing Need and Demand Assessment 2017 (CD XX). The Housing Supply Target of the Aberdeen City and Shire Strategic Development Plan 2020 is the policy interpretation of the Housing Need and Demand Assessment 2017's projections. Paragraph 9.11 of the Proposed Local Development Plan sets of the scale of the affordable housing requirement within the city stating, "*Figures in the HNDA identify up to 1,368 new affordable homes needed per annum over a 20-year period.*" The Housing Supply Target of the Strategy Development Plan 2020 sets a target of 5005 affordable homes for the period 2020-2032, or 385 affordable homes per annum. In terms of geographical distribution, the Housing Need and Demand Assessment 2017 (CD XX) does not provide the granularity to do this, and engagement with the development industry has shown that the flexibility to move affordable housing delivery around the City has proved beneficial. Additionally, paragraph 118 of Scottish Planning Policy 2020 (CD XX) requires Housing Supply Targets to be set out at Local Authority and Housing Market Area levels. Over the last 4 years this approach has help deliver 1,242 affordable houses, with an additional 461 expected to complete this year (CD XX – SHIP). Over the period 2017-2021, the affordable housing supply target and the delivery of affordable homes is in alignment.

Reduction in Exceptional Circumstances

891: Paragraph 9.13 of the Proposed Local Development Plan is clear that "*...provision of affordable housing should not jeopardise the delivery of housing as this would be counter-productive...*" As such it is recognised that a flexible approach must be available in certain circumstances. The Policy position must nevertheless be clear to prevent speculative development being brought forward based on an assumption that affordable housing is optional.

Policy H5 Affordable Housing – Conformity with Scottish Planning Policy

711, 897: This wording was considered in the Report of Examination to the extant Local Development Plan 2017 and was deemed to be appropriate.

The level of demand for affordable housing in Aberdeen as evidenced in the Housing Need and Demand Assessment 2017 (CD XX) continues to far outstrip delivery, and this has been the position as far back as the Examination into the Local Development Plan 2012 (Issue XX, CDXX). While the 25% requirement is not sufficient to meet that demand, it is recognised that, as set out in Scottish Planning Policy and in paragraph 9.13 of the Proposed Local Development Plan, that the viability of developments is vital. Nonetheless, the Housing Supply Target of the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) is that 35% of new homes should be affordable. A combination of private and public sector delivery will be required to meet this target.

The inclusion of “*no less than 25% affordable housing*” gives clear and unambiguous direction to any prospective developer that including that level of affordable housing within their development will satisfy the Planning Authority’s requirements. This clarity is something which Planning Circular 6/2013: Development Planning (CD XX) aims to achieve. While Paragraph 9.13 of the Proposed Local Development Plan goes on to explain that in exceptional circumstances flexibility can be considered, the clear policy statement means that any flexibility must be justifiable and should not be a starting position for development.

Flexibility, Offsite Provision and Commuted Sums

717, 891, 900: This issue was considered in the Report of Examination into the extant Local Development Plan 2017 (CD XX). Policy H5 in the Proposed Local Development Plan mirrors that of the extant Local Development Plan 2017 (CD XX) and the Local Development Plan 2012 (CD XX) in setting a policy preference for affordable housing delivered onsite. In preparing the Supplementary Guidance to the extant Local Development Plan 2017, considerable consultation was undertaken through the Affordable Housing Forum, made up of the development industry, affordable housing providers and the Council. This consultation saw a range of other flexible delivery options included within the Supplementary Guidance including off site delivery. While this will remain a valuable delivery method moving forward, it was proposed as an alternative in instances where onsite delivery was not possible. Over the course of the last five years it has become clear that this method of delivery is being offered in instance where onsite delivery is both possible and more appropriate. Offsite delivery also presents a range of other challenges such as additional planning consents, more complex Section 75 legal agreements and land transactions, that can ultimately jeopardise the delivery the affordable housing in some cases. Such complexities also impact and delay on the delivery pipeline required to meet the ongoing need for affordable housing.

While the respondent is correct that the level of affordable housing delivery has increased in recent years, this has been driven by a dramatic increase in available Scottish Government funding for affordable housing and a range of Masterplan sites coming on stream.

It is felt that the wording of the Proposed Policy is appropriate to ensure that the central tenant of the Development Plan, that of taking a place-based approach to delivering sustainable mixed communities, is maintained. It is the intention of the Council, as set out in the Proposed Policy, to continue to provide a range of alternative approaches, including offsite delivery, where they are appropriate.

Committed sums continue to play a role in the delivery of affordable housing, however they are not a preferred option. While committed sums can be useful to cross subsidise

affordable housing sites, particularly where Scottish Government grant funding is limited, it ultimately reduces the overall delivery of affordable housing. Where a 25% affordable housing policy position falls short of the affordable housing demand set out in the Housing Need and Demand Assessment 2017 (CD XX), and through the policy interpretation of the housing supply target, reducing that delivery further only exacerbates the overall problem. That said, it is still an option which has and will continue to be used where appropriate.

As per the previous review of the commuted sums, and as set out in the Affordable Housing Supplementary Guidance (CDXX) to the extant Local Development Plan 2017 (CD XX), any review will be undertaken with the independent district value and in consultation with the Affordable Housing Forum, before being subject of a public consultation and will remain in place for the duration of the Plan. This would also apply to any review of low-cost home ownership. The Council is acutely aware of the certainty required for the timely delivery of sites and the importance of taking a partnership approach to the delivery of affordable housing.

717, 891: Paragraph 9.14 of the Proposed Local Development Plan is clear in stating “*To maximise the provision of affordable housing it is the aim of the Council to take a flexible approach to its delivery, with a view to maximising opportunities to achieve the highest level possible and satisfy need.*” This will also be carried forward into supporting Aberdeen Planning Guidance.

Identifying Sites.

717, 891: It is the preference within the Proposed Local Development Plan to see affordable housing delivered as part of mixed sites and paragraph 9.15 states that “*The affordable housing provision should be on site, integrated with, and indistinguishable from the market housing*”. The Proposed Local Development Plan has a range of large Masterplan Zones which are being delivered by a range of market and affordable housing developers with all sites being delivered by multiple developers. As such it is clear that with the 25% affordable housing policy a broad range of sites and opportunities are now available, and this has resulted in a significant level of affordable housing delivery in recent years.

It is also clear that grant funding, not site availability, is likely to limit affordable housing delivery moving forward. Notwithstanding that, Aberdeen City Council has recognised that the development industry cannot carry all the burden of delivering affordable housing. It has therefore committed to the delivery of 2,000 Council homes as part of the Administration’s program. To date, 241 social rent homes have been delivered with 146 expected this year 2020/21, and a delivery pipeline of a further 600 thereafter (CD XX. (CDXX Committee report for the SHIP).

Threshold for Affordable Housing

897: This issue was considered in the Report of Examinations (CD XX) to both the extant Local Development Plan 2017 and the Local Development Plan 2012 and was deemed to be appropriate.

The threshold of five units was set to capture the significant number of smaller developments, including change of use applications, which come forward across the City. To effectively omit these smaller brownfield developments would put greater reliance on

larger greenfield development and would limit the opportunity to deliver new affordable housing in already established communities.

By setting the threshold at five units it ensures that the delivery begins at one affordable unit, but accepting that it might not always be appropriate to deliver this on site, alternative delivery mechanisms are available for developments up to 20 units.

In line with Planning Advice Note 2/2010: Affordable Housing and Land Audits (CD XX) developments of 20 units and above are expected to deliver their requirement on site, with 25% of 20 units (5 affordable units) being an effective number for delivery through most forms of affordable housing.

The Council has nevertheless recognised that in some cases, or in some areas, this requirement may not always be appropriate. For example, in the City Centre the requirement to provide affordable housing has currently been waived. This is to encourage many of the vacant buildings to be brought back into use and recognising that in the historic central core of the City there are additional development costs. However, to simply raise the threshold for all developments would reduce the overall delivery of affordable housing and would be detrimental to the housing market.

Policy H5 - Affordable Housing - Aberdeen Planning Guidance

717, 891, 900: Planning Circular 6/2013: Development Planning (CDXX) notes that Development Plan should focus on Vision, the Spatial Strategy, overarching and other key policies and proposals. The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in non-statutory Aberdeen Planning Guidance. However, the Proposed Local Development Plan provides details of some of the issues which will be covered by Aberdeen Planning Guidance underneath the corresponding policy.

Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no locus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that all stakeholders will be able to comment at the appropriate level of detail. Planning Circular 6/2013: Development Planning (CDXX) outlines the benefit of non-statutory guidance is that it can be updated quickly to take account of any issues which arises during the life cycle of the Plan. Although non-statutory guidance will not form part of the Development Plan, when adopted it will be a material consideration in decision making.

The policy and key aspects of the current Supplementary Guidance have been carried forward in the Proposed Local Development Plan. It is proposed that the Aberdeen Planning Guidance supporting this Policy will be updated in consultation with the Affordable Housing Forum and key stakeholders before being issued for public consultation.

Policy H7 – Student Accommodation Developments

555: The respondent's contribution to the local economy and education provision is noted. The support for the Proposed Policy is welcome. The inclusion of the statement "*new proposals will be assessed for relevant developer obligations*" is appropriate regardless of

Policy I1 – Infrastructure Delivery and Planning Obligations. All Main Issues Report submissions have been reviewed and considering in the production of the Proposed Local Development Plan.

Policy H8 - Houses in Multiple Occupation and Overprovision: General

At the Full Council Meeting on 2 March 2020 Elected Members considered the Proposed Local Development Plan as presented to them by Officers (CDXX). An Amendment was put forward to Policy H8 – Houses in Multiple Occupation and Overprovision. This amendment proposed to reduce the Houses of Multiple Occupation provision in a given area from 15% to 12%. A rationale was offered that having considered the Proposed Policy in conjunction with the views of Community Councils that; the Amendment was acceptable and in the interests of established communities within areas under pressure from an over provision of Houses in Multiple Occupation. Elected Members considered that this would bring the City of Aberdeen in line with other Cities such as Dundee offering consistency in planning terms across multiple jurisdictions.

Objection to Policy H8 - Houses in Multiple Occupation and Overprovision:

555: The respondent refers to Houses in Multiple Occupation Overprovision Policy - Report on Public Consultation - CHI/17/113 (SD XX) which was presented to Elected Members in August 2017. While at the time of consideration the report recommended that no policy was immediately needed, Officers were instructed by Elected Members to review the options available to facilitate mixed/balanced communities and report back to the Council's Communities, Housing and Infrastructure Committee. The respondent incorrectly asserts that a policy relating to the overprovision of houses in multiple occupation was not included in the Main Issues Report 2019. Paragraph 8.6 of the Main Issues Report 2019 (CD XX) specifically addressed this matter and set out the Preferred Option as a threshold of 15%. A Main Issues Report is a consultative document therefore it is normal for there to be changes to the Preferred Option a result of the process. As such, this is neither a new issue nor is it one considered in the absence of consultation and engagement.

Proposed Policy H8 - Houses in Multiple Occupation and Overprovision addresses specific issues within certain communities of Aberdeen City and will help to maintain balanced within them. There are areas of the City, usually within proximity of higher education institutions, where the provision of Houses in Multiple Occupation is of higher and denser levels. The occupation of residential properties as Houses in Multiple Occupation has resulted in a reduction of market housing for wider sections of the community such as families. This is an issue the Council seeks to manage in areas where demand for Houses in Multiple Occupation is concentrated.

The Proposed Policy is clear with parameters set out in the introductory section from paragraph 9.23 onwards. Additionally, parallel legislation in the form of draft guidance relating to both Houses in Multiple Occupation and Short Term Lets licences has been withdrawn from Parliament subject to further review. Further policy detail and support will be brought forward through Aberdeen Planning Guidance: Houses in Multiple Occupation Overprovision which sits outside the Proposed Local Development Plan Examination.

The Council have determined that the methodology to be used will be through small data zone areas, which compose of Census Output Areas which are considered to be large enough for statistics to be presented accurately but small enough that they can be used to

represent communities of approximately 500-1000 residents. The shape of the zones will represent physical boundaries where possible. The Proposed Policy will apply to three or more unrelated people living together whether in a house or a flat. Licenced Houses of Multiple Occupation would not generally exceed 12% of total residential properties within a small data zone.

650, 854, 1135: The respondents' submissions are in alignment with the amendments made by Elected Members and the threshold of 12% in the Proposed Local Development Plan.

833, 836: As addressed in the response to submission 555, the Council has given detailed consideration to the methodology for considering the boundaries which will inform the monitoring and measuring of Houses in Multiple Occupation, As such is it considered that the most viable method is to use small data zones. Small data zones are used to inform other data collection, monitoring and policy development as they offer a more granular perspective than, as suggested by the respondents Census Output Areas.

Reporter's conclusions:

Reporter's recommendations:

Issue 31	POLICIES CF1 AND CF2: COMMUNITY FACILITIES	
Development plan reference:	Pages 81 - 82	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>sportscotland (746) NHS Grampian (882) CALA Homes (North) Ltd (900) Theatres Trust (956)</p>		
Provision of the development plan to which the issue relates:	Ensure the provision of community facilities	
Planning authority's summary of the representation(s):		
<p><u>Policy CF1 - Existing Community Sites and Facilities</u></p> <p>746: Clarity sought on the policy wording. Reference is made to alternative uses being allowed if land or buildings become surplus to existing or future need. Paragraph 9.35 refers to facilities falling out of use. Wish to highlight that a facility being surplus is different to a facility falling out of use and provides example of a situation where a facility closes due to unaffordable maintenance costs but the swimming demand remains unmet. Surplus relates to over-provision and level of demand. It is not clear what evidence is required to demonstrate that sites/facilities are surplus to need as opposed to falling out of use due to other factors and where there has been no simultaneous reduction in need or demand. This is important in ensuring services provided by and through community facilities are protected.</p> <p>900: While the respondent supports that Policy CF1 Existing Community Sites and Facilities allows for alternative uses in land zoned for health, education and community facilities where land or buildings become surplus to current or anticipated future requirements it is considered that the final paragraph of this policy is unclear and appears to be slightly in contradiction with the provisions of the policy. This should be clarified.</p> <p>882: Supports Policy CF1</p> <p>956: Supports policy. Policy scope should be broadened to include cultural venues such as theatres and music venues.</p> <p><u>Policy CF2 - New Community Facilities</u></p> <p>882: Supports Policy CF2</p>		
Modifications sought by those submitting representations:		

Policy CF1 - Existing Community Sites and Facilities

746: The respondent requests confirmation of the distinction between facilities that are deemed 'surplus' and those that have 'fallen out of use' for other reasons. Clarification of the evidence required to demonstrate a facility is surplus to need.

900: The respondent considers that Policy CF1's final paragraph should be modified to state *"Where a CF1 area contains uses other than that for which the area has been designated and these uses make a positive contribution to the character and community identity of the area, any proposals for development or changes of use to land or buildings that are not surplus to current or anticipated requirements, whether or not for the community use recognised in the designation, will be opposed if a likely result would be significant erosion of the character of the area or the vitality of the local community"*.

956: The respondent requests that the policy should be broaden in scope to include cultural facilities and venues.

Summary of responses (including reasons) by planning authority:

Policy CF1 - Existing Community Sites and Facilities

746: The preamble to and body of Proposed Policy CF1 makes it clear that other uses, which serve community needs, would be open to consideration if an existing use is not viable or meeting community needs. It is noted that the respondent wishes to clarify between a facility which is not used and a facility which is not required or surplus to requirements. It is considered that such a distinction has been included in the policy preamble paragraph 9.34. Surplus is considered to be explained well in the Proposed Policy as it would mean that there is sufficient provision of a service or facility that the surplus facility is no longer required. Planning for community sites and facilities is constantly monitored and invested in by the Council.

900: The last paragraph of Proposed Policy CF1 contains the same wording as that of Policy CF1 in the extant Local Development Plan 2017 (CD XX) and has been carried forward. The paragraph has been retained to ensure the continuity of services which serve the communities which depend on them.

882: Support for the Proposed Policy is noted and welcomed.

956: Support for the Proposed Policy is noted. With regard to expanding the Policy's scope to include cultural venues such as theatres and music venues it is considered the nature of such venues is consistent with the definition of community sites, and the impact of their loss is reflected by the implications cited in the policy.

Policy CF2 - New Community Facilities

882: Supports for the policy is noted and welcomed.

Reporter's conclusions:

Reporter's recommendations:

Issue 32	POLICIES VC1, VC2, VC3, VC4, VC5, VC6 AND VC7: VIBRANT CITY	
Development plan reference:	Pages 83 - 87	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Doug Connell (4) Michael Jack (629) Colin Higgins (655) Joe Burn (656) Mike and Teresa Gray (684) Rodrigo Rendon (710) Standard Life Assurance Limited (785) Cults, Bieldside and Milltimber Community Council (833) Kenny Murphy (839) Lorcan O'Connor (842) Castlehill and Pittodrie Community Council (843) LSREF3 Tiger Aberdeen S.À.R.L. (C/o Ellandi LLP) (855) Scottish Government (885) Maíra Colombrini (912) Union Square Developments Ltd (Hammerson plc). (913) Queens Cross / Harlaw Community Council (932) The Grandhome Trust (959)</p>		
Provision of the development plan to which the issue relates:	Sets out the Vision for the City Centre, Union Street and the West End	
Planning authority's summary of the representation(s):		
<p><u>Strategy</u></p> <p>4: Continued Green Belt development is causing the City Centre to be desolate as people move out of town. Notes that Deeside residents travel to Aberdeenshire rather than Aberdeen City for shopping and leisure purposes.</p> <p>785: General support for approach taken on retailing as set out in Section 10 of the Proposed Local Development Plan.</p> <p>684, 839: Council will have to revise the Proposed Local Development Plan to address how the City will change due to COVID as it was prepared prior to pandemic and there is a decrease in day time activity.</p> <p>843: Welcome focus on promoting a greater variety of uses, activities and day and night time infrastructure. Important for wellbeing of population and will ensure greater diversity of economic opportunity.</p>		

912: In favour of a Vibrant City and developing the economy (in light of oscillations of Oil and Gas Industry). A Vibrant City can and should have more than bars and clubs. The right type of business can bring diversity to the city to benefit all. A mix of uses is promoted.

General

684, 710: Comments submitted on Main Issues Report Schedule 4's response by Officers.

Policy VC1 - Vibrant City

913: Support inclusion of Policy.

913: Support for new and expansion of existing developments within the City Centre is welcomed to ensure a dynamic City Centre and resist development at peripheral locations. This will be essential to build long-term resilience per paragraph 10.2. Suggest that wording of paragraph 10.5 regarding diversification of uses is included within Policy VC1.

655, 656, 684, 912: Clarification sought on the objectives of the Vibrant City Policies.

655, 656, 684: Specific detail and examples sought on 24 hour economy proposals in the area surrounding Bon Accord Terrace / Bon Accord Crescent. Changes need to be assessed to ensure no detrimental impact on residents via a holistic and independent risk assessment. The Council's Anti-Social Behaviour Charter, along with committee statements ensuring there is no plan to increase the number of pubs and clubs, need to be integrated into the Local Development Plan. Comments relating to Local Development Plan's integration with Operational Delivery Committee and Aberdeen City Licensing Board.

655, 656: Management of anti-social behaviour needs to be included in the Proposed Local Development Plan, with Aberdeen City Council responsible for managing it.

710: Proposed Local Development Plan on page 84 states the onus falls on the applicant/agent to demonstrate adverse impact of night economy establishments. No establishment can control patrons when outside the premises on the street. Residents suffer the consequences of anti-social behaviour. Aberdeen City Council and the Licensing Board need to take active responsibility for managing and decreasing anti-social behaviour by limiting the source of the problems.

Area Specific Comments

656, 710, 842, 912: Concerns raised about anti-social behaviour in the Justice Mill Lane, Langstane Place, Windmill Brae and Bon Accord Terrace, Bon Accord Crescent area. Issues experienced are provided and ascribed to relate to pubs/clubs in the vicinity.

710, 912: It is unclear what the Proposed Local Development Plan aspiration for a "Vibrant City" means and how it will be implemented in the Justice Mill Lane, Langstane Place, Bon Accord Crescent and Bon Accord Terrace area. Specific questions and elaboration requested relating to concept and implementation of Vibrant City and 24-hour economy.

710, 842: Queries whether the Proposed Local Development Plan aspiration for a Vibrant City includes any pedestrianisation along Justice Mill, Langstane Place and Bon Accord

Terrace and seeks further information on prioritised transport interventions referred to by in a meeting of Aberdeen City Councils Operational Development Committee in March 2020.

842: Pedestrianisation will increase anti-social behaviour and these issues need to be considered within the Proposed Local Development Plan.

842: Seeks clarity on intentions for night time economy within the Bon Accord Resident Association Area to ensure there are no conflicts with existing agreements.

Anti-Social Behaviour

710, 839, 842, 912: The Proposed Local Development Plan does not acknowledge anti-social behaviour or how to address it. There is no planned or credible approach. Implementation of the Proposed Local Development Plan cannot be effective if the impact of anti-social behaviour is not acknowledged and dealt with. Aberdeen City Council should be more specific about how it intends to safeguard families living in the City Centre from anti-social behaviour.

839, 842: Residents will be subjected to increased levels of anti-social behaviour, drugs and litter as a result of increased footfall and lingering at night time. Appropriate policies should be in place to protect residential amenity of the City Centre. Clarification sought over evidence used to assess amenity and where more lingering will be proposed.

710, 839, 912: Examples of issues experienced are provided.

912: Promotion of bars and clubs only rather than a mix of uses may encourage anti-social behaviour.

Licensing

710: Notes decisions made by Licensing Board with regards to Premise License overprovision without consultation with residents. Raises concern that plans for vibrancy in the City Centre need to be considered alongside licensing changes in a holistic way.

842: Comments submitted regarding the Licensing Board policy changes and granting of late opening.

843: Ongoing dialogue needed between Planning, licensing and trade bodies.

Policy VC2 - Tourism and Culture

855: Supports Policy VC2 and support requirement to comply with sequential approach.

Policy VC3 - Network of Centres

785: Support the Proposed Local Development Plan approach to continue to safeguard existing retail centres and resist allocating any new out-of-town retail parks, particularly within the Aberdeen Green Belt and at Aberdeen Western Peripheral Route junctions. This is confirmed at paragraph 10.13.

785: Support the continued identification of Beach Boulevard Retail Park as a Commercial Centre within the Aberdeen Network of Centres.

833: The 2500 square metre minimum for a required Retail Impact Assessment is too high for Out Of Centre developments and should be reduced to 1500 square metres. Comments are in context of two retail proposals for 1900 square metres and 2000 square metres respectively where existing local retail provision would be adversely impacted and where average floor spaces are 300-500 square metres.

959: Supports approach to Town Centres and notes Main Issues Report comments that Grandhome Town Centre will be included as a Tier 2 Town Centre following its development.

913: Support approach. Policy and supporting text amendments suggested to ensure clarity and to reflect Scottish Planning Policy. Lack of clarity if the three exceptions to the Policy are applicable individually or all need to be present to apply. Criterion 3 does not wholly accord with Scottish Planning Policy. Similar to Policy VC4 all criterion (with suggested amendment) should be met to ensure control of development.

885: Sequential approach should be amended to reflect Scottish Planning Policy's sequential approach on page 68. Suggested rewording is provided to ensure compliance with Scottish Planning Policy. The Proposed Local Development Plan drops Town Centres, District Centres and Neighbourhood Centres down in the order of preference to Tiers 2, 3 and 4 - these should be Tier 1 under Scottish Planning Policy's approach. The Proposed Local Development Plan puts Commercial Centres higher up in preference after Neighbourhood Centres and does not include 'edge of centre' in its five-tiered approach. Scottish Planning Policy places 'edge of town centre' sites in Tier 2, above Commercial Centres. The approach taken places greater preference on Commercial Centres than expected by Scottish Planning Policy and could be seen to switch the order of 'edge of town centre' sites, and Commercial Centres, compared to Scottish Planning Policy. The approach does not make reference to out-of-centre locations that are, or can be, made easily accessible by a choice of transport modes. Policy appears to leave it open that an 'edge of centre site' could be the next option, if there is no available site in the centre the developer is targeting, without considering the availability and suitability of sites in other town or local centres.

Policy VC4 - City Centre and Retail Core

855: Supports Policy VC4 and boundaries of City Centre/Retail Core areas. Suggests Policy be expanded to include specific reference to food and drink uses (Class 3). This use is specifically referred to in Policy VC6 and its omission in Policy VC4 may imply that Class 3 is not permitted, which cannot be the intention of this Policy.

912: Previous iterations detailed a 24 hour economy which would have negative consequences. Proposed Local Development Plan doesn't detail this but it doesn't preclude pursuance of this to achieve a Vibrant City. Proposed Local Development Plan is not specific enough to set parameters regarding type of business that is being attracted. Community can help to provide details of needs and expectations.

913: Core retail function needs to be tightly defined to concentrate the area where retail takes place. Retail Core should not extend beyond Bridge Street/Union Terrace. See Issue 16: City Centre General, Alternative Sites: City Centre and Urban.

Policy VC5 - City Centre Living

629: More emphasis needed on conversion of empty office properties to revitalise the City Centre by providing more residential accommodation.

843: There should be encouragement of mixed uses (residential, office and commercial) of floors beyond ground level to support 'City Centre Living' proposal.

855: Supports Policy VC5. There is concern that it could be interpreted that residential amenity cannot be achieved in the same built structure as specified at (1) and (2) and may be too generalised. Provides example of where this may not apply.

Policy VC6 - West End Area

932: Does not support a mixture of uses as this will lead to conflict between uses. There is historic evidence of this in the area from hotels, restaurants and pubs. Disputes Main Issues Report statement that there may be issues returning existing office extensions to residential use. Support for this area being zoned as residential. See Issue 16: City Centre General, Alternative Sites: City Centre and Urban.

Policy VC7 - West End Shops and Cafes

843: Pleased to see support for independent business as they provide a unique sense of place for people residing and visiting the city and offer employment and an environment of entrepreneurship.

Modifications sought by those submitting representations:

Strategy

4: Stop all out of town developments.

710: Approach outlined needs to change. The Council's antisocial behaviour charter should be explicitly included in the Proposed Local Development Plan - "*Antisocial behaviour will not be tolerated and residents have the right to live peacefully in safe and secure communities*". Clear actions to tackle anti-social behaviour to be outlined in the Proposed Local Development Plan.

710: Proposed Local Development Plan should explicitly state how the Licensing Authority and Aberdeen City Council will interact to ensure that aspiration for Vibrant City is balanced with a safe place for residents to live. Proposed Local Development Plan should be holistic with independent risk assessment to consider implications of changes proposed.

Policy VC1 - Vibrant City

684: Identify area designed for night time economy.

913: Incorporate replacement text: "*Proposals for new development, or the expansion of existing facilities, including the diversification of non-retail uses, will be supported in principle within the City Centre and Retail Core where they contribute to its vibrancy and vitality throughout the day and/or into the evening.*"

842: Add text to Policy VC1: "*There are no plans to turn Justice Mill, Langstane Place and/or Windmill Brae into a centre for pubs and clubs*". "*All residents have a right to live peacefully in safe and secure communities*".

Policy VC3 - Network of Centres

833: Reduce threshold for Retail Impact Assessment to 1500 square metres.

913: Modify paragraph 10.11 by deleting "*in principle*" from the first sentence.

913: Modify Policy VC3 by addition and modification of text: "*Proposals for significant footfall generating development on an edge-of-centre site will not be supported unless all of the following criteria are met: 3) All potential sites/opportunities within relevant sequentially preferable centres have been satisfactorily discounted as unsuitable or unavailable within a reasonable timeframe. Major retail development outwith the City Centre and Retail Core will be resisted in accordance with the sequential approach and where there would be significant retail impact on existing facilities and planned development.*"

885: Modify to read: "*Proposals for significant footfall generating development on an edge-of-centre site will not be supported unless: 1. no suitable site for the proposal is available or is likely to become available in a reasonable time in a sequentially town centre (including city and local centres); 2. the proposal is well-connected to the centre which it is on the edge of; and 3. the proposal would have been appropriate (in terms of use and scale) had it been able to be located within the centre which it is on the edge of.*"

Policy VC4 - City Centre and Retail Core

855: Expand Policy to include specific reference to food and drink uses (Class 3).

913: Add text to end of third paragraph: "*Major retail development outwith the City Centre and Retail Core will be resisted having regard to the sequential approach and retail impact policy considerations.*"

Policy VC5 - City Centre Living

855: Add word 'generally' to third sentence "*There is a presumption suitable residential amenity cannot generally be achieved if the proposed development is within the same built structure as:*"

Summary of responses (including reasons) by planning authority:

Strategy

4: Issue 1: Vision, Spatial Strategy and Land Release Policy LR1 provides response to the comment regarding development on the Green Belt. Retail/leisure catchments do not necessarily follow local authority boundaries and given the close relationship of the

Aberdeen City and Aberdeenshire City Region it is possible that Deeside residents are travelling to their nearest retail centre which may not be located within Aberdeen City Council boundaries. The Vibrant City policies aim to revitalise the City Centre and by identifying a hierarchy of centres this ensures that significant footfall generating development is directed to the City Centre as the first option. The retail strategy has been informed by an updated Retail Study Volumes 1 - 3 (CDXX) (CDXX) (CDXX).

785, 843, 912: Support is noted and welcomed. The Vibrant City part of the Proposed Local Development Plan looks to support the City Centre, tourism, regeneration and existing retail. The Proposed Policies provide policy criteria and guidance on the use of land (such as in the City Centre and Retail Core). We agree that major retail proposals should be directed to the retail hierarchy, with the City Centre being the first option. The Proposed Local Development Plan will continue to focus new retail, commercial, leisure and other appropriate uses in the City Centre in accordance with the sequential approach outlined reflecting Scottish Planning Policy (CDXX) paragraphs 60 and 68. The retail strategy has been informed by an updated Retail Study Volumes 1 – 3 (CDXX) (CDXX) (CDXX).

843, 912: We agree that a mix of uses can bring diversity and do not support or preclude any specific type of development.

684, 839: A Local Development Plan is a long term land use document providing a robust strategy and policy approach to assess development proposals. Whilst there is a temporary decrease in day time activity it is even more important to have a robust strategy to encourage growth of, and footfall within, the City Centre to support a return to pre-pandemic levels.

710: It is not the remit of a land use planning document to address anti-social behaviour. As stated in Section 1 of the Proposed Local Development Plan, the Plan was not written in isolation and it is only one of many tools available to the Council to help achieve its goals and objectives. It does not repeat every local/national policy/strategy and it would not be appropriate to incorporate this within the Proposed Local Development Plan. Anti-social behaviour falls within the remit of the Antisocial Behaviour Investigation Team who have the power to enforcement action depends on the circumstances. The Scottish Parliament has introduced the Antisocial Behaviour etc. (Scotland) Act 2004 (CDXX) to allow agencies to stand up to the minority whose behaviour causes serious nuisance in communities. Although not directly legislated by the planning system, Planning Advice Note PAN 77: Designed Safer Places (CDXX) provides advice on how planning can help to create attractive well-managed environments which help to discourage antisocial and criminal behaviour and is a material consideration in the determination of planning applications. The Proposed Local Development Plan recognises the importance of amenity for residential development and follows a design-led placemaking policy approach as is outlined through Proposed Policies D1: Quality Placemaking, D2: Amenity, the six qualities of successful placemaking and WB3: Noise.

710: The Proposed Local Development Plan is prepared over a five year period and is assessed in a multitude of ways at different stages by both internal Council departments, external parties and through public consultation. It concludes with an independent assessment by the Directorate for Planning and Environmental Appeals. The planning system can only consider issues related to land use and has no remit with regards to licensing issues. The Licensing Board will assess relevant proposals separately through their own processes where required.

General

684, 710: Comments on previous stage of Plan preparation are noted.

Policy VC1 - Vibrant City

913: Support is noted and welcomed. The Proposed Local Development Plan has taken a step change in moving away from the protected minimum retail percentages element, as seen in the retail policies of the extant Local Development Plan 2017 (CDXX), to increase flexibility of uses in alignment with the objectives of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) and to support vibrancy, vitality and viability of our existing retail centres per the updated Retail Study Volumes 1 – 3 (CDXX) (CDXX) (CDXX). Whilst non-retail uses are promoted to increase diversity of uses, the City Centre and Retail Core remains the first option for major retail developments. With the flexibility now offered through Proposed Policy VC1 it is not considered necessary to specifically mention non-retail uses as applications for all development will be assessed on their own merits and their accordence with the Development Plan taking into account the sequential approach and hierarchy of centres. There is no requirement to amend the Proposed Policy text.

655, 656, 684, 912: The Vibrant City part of the Proposed Local Development Plan looks to support the City Centre, tourism, regeneration and existing retail. The policies within this part provide a policy framework and associated guidance on the use of land (such as in the City Centre and Retail Core). In alignment with the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) and the updated Retail Study Volumes 1 – 3 (CDXX) (CDXX) (CDXX) the policies aim to create a more liveable environment for residents and visitors alike. A move towards extending opening hours and increasing the residential population within the City increases opportunity for a diverse range of economic activity and to keep life in the City Centre outwith the hours of 9am-5pm. The key issue is to get more people living in the City Centre to support an economy based around day to day living.

655, 656, 684, 912: There are no specific 24-hour economy proposals in the Proposed Local Development Plan. It provides the land use planning vision and framework to assess development proposals. As stated above, the planning system can only consider issues related to land use and has no remit with regards to licensing issues or antisocial behaviour.

710: As stated in paragraph 10.15 of the Proposed Local Development Plan, the Agent of Change principle is fundamental in supporting a mix of uses in the City Centre. It places the responsibility for mitigation of noise from new developments on those carrying out the new development or operation and appropriate residential amenity must be maintained. Proposed Policy D2 - Amenity provides principles for new development to be assessed against. Proposed Policy WB3 – Noise specifically includes detail relating to leisure noise related to night clubs, pubs, live sporting events, concerts or live music venues. The planning system can only consider issues related to land use and has no remit with regards to licensing issues or antisocial behaviour. The Licensing Board will assess relevant proposals separately through their own processes where required. Similarly, there are dedicated teams within the Council with the specific remit of investigating antisocial behaviour.

Area Specific Comments

656, 710, 842, 912: As stated above, the planning system can only consider issues related to land use and has no remit with regards to antisocial behaviour. See response above relating to Agent of Change and Proposed Policies D2 and WB3. Should any development proposals that require planning permission be submitted in the vicinity of Justice Mill Lane, Langstane Place, Windmill Brae, Bon Accord Terrace or Bon Accord Crescent an opportunity for public comment will be provided and a site specific assessment against the policies in the Development Plan will be undertaken through the planning application process.

710, 912: See response to Strategy and Proposed Policy VC1 above which responds to the aspirations for a Vibrant City and a 24 hour economy.

710, 842: No specific proposals are contained within the Proposed Local Development Plan for the pedestrianisation of Justice Mill Lane, Langstane Place, Bon Accord Crescent or Bon Accord Terrace Area. The Proposed Local Development Plan does not contain every proposal contained within other plans, programmes or strategies prepared by the Council. As the specific prioritised transport intervention referred to is not contained within the Proposed Local Development Plan there is no unresolved issue to examine.

842: Comments on pedestrianisation are noted but as there are no specific proposals for this in the Proposed Local Development Plan no further response can be given on this matter.

842: Whilst the Main Issues Report (CDXX) section 3.7 contained a Main Issue and options relating to a 24 Hour City this terminology has not moved forward into the Proposed Local Development Plan as there appeared to be confusion over the ethos and intention of the Policy. The principle of the Policy is to create a liveable, vibrant City Centre where residents and visitors wish to live, visit, shop and experience. Whether that be evaluated by the number of people living in the City Centre, footfall, or by later opening hours for cafes, bars and restaurants, the ethos remains the same. It is not the intention of the Proposed Local Development Plan to create specific night time economy proposals but guide and promote appropriate uses in the right place to fulfil the vision of vibrancy and vitality. See also response above which responds to the night time economy comment.

Anti-social Behaviour and Licensing

710, 839, 842, 843, 912: See earlier responses with regards to anti-social behaviour and licensing. The Proposed Local Development Plan does not promote one use over another within the City Centre. The Council's 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, through the Local Development Plan, provide the vision and policy framework to assess proposals in line with Scottish Planning Policy (CDXX), the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and the Aberdeen City Centre Masterplan and Delivery Programme (CDXX). 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 for residents and visitors alike. Proposals for night time uses will be assessed on their own merits through both the planning system and licensing board where required.

Policy VC2 - Tourism and Culture

855: Support is noted and welcomed.

Policy VC3 - Network of Centres

785, 913, 959: Support is noted and welcomed.

913: In line with Scottish Planning Policy (CDXX) paragraphs 60 and 68 and the updated Retail Study Volumes 1 – 3 (CDXX) (CDXX) (CDXX), the Proposed Local Development Plan supports a Town Centre First approach to all significant footfall generating development. The wording “in principle” reinforces this approach but recognises that there may be circumstances where proposals serving a local need or a new development area may be necessary. The wording “in principle” does not dilute the primacy of the City Centre for all significant footfall generating development. There is no requirement to modify paragraph 10.11.

913: The use of semi colons and the word “and” at the end of criterion 2 makes it clear that all three criteria apply rather than being applicable individually. However, if the Reporter is so minded and considers that clarity is required, the suggested addition of “*all of the following criteria are met*” is considered acceptable.

913: Criterion 3 as currently worded is the same as within the extant Local Development Plan 2017 (CDXX) and previous Local Development Plan 2012 (CDXX). The approach has been considered via two previous Examinations and both the original Retail Study (CDXX) and updated Retail Study Volumes 1 – 3 (CDXX) (CDXX) (CDXX). It is clear from Proposed Policy VC3 that the sequential approach applies to all proposals whether they are within a designated centre, on edge of centre or outwith a designated centre. The suggested amendment to criterion 3 is considered unnecessary and is duplicating wording requiring assessment against the sequential approach which is already a requirement as detailed in the first paragraph of Proposed Policy VC3. The wording could potentially add a layer of confusion as this section of Policy VC3 requires specific additional considerations for proposals on edge-of-centre sites where the sequential approach would already apply as per the first paragraph of Policy VC3.

833: The issue of requiring a Retail Impact Assessment for smaller retail and leisure proposals was considered during the Examination of the extant Local Development Plan 2017(CDXX). In Issue 21 of the Report of Examination (CDXX) the Reporter recommended an amendment to Policy NC4 – Sequential Approach and Impact to clarify that impact analysis may sometimes be required for smaller developments, in line with paragraph 71 of Scottish Planning Policy (CDXX). As a result, amendments were made to Policy NC4 of the extant Local Development Plan 2017 (CDXX). Proposed Policy VC3 contains the same policy wording as that which the Reporter recommended as an amendment and as such there is no issue to resolve and no further modifications are required to the Policy.

885: The retail strategy was informed by Scottish Planning Policy (CDXX), the Aberdeen City and Aberdeenshire Retail Study 2013 (CDXX) and the updated Retail Study Volumes 1 – 3 (CDXX) (CDXX) (CDXX) and has not significantly changed in approach since the Local Development Plan 2012 (CDXX). In accordance with paragraph 61 of Scottish Planning Policy (CDXX), the Proposed Local Development Plan, through Proposed Policy VC3: Network of Centres and future Aberdeen Planning Guidance set out the network of

centres in full detail. The network is tailored to the locality as anticipated by paragraph 61 of Scottish Planning Policy (CDXX) where it states “network is likely to include...”. In Aberdeen the network of centres, as informed by Volume 1, page 42 Table 4.13 of the updated Retail Study (CDXX), constitutes a Regional Centre, Town Centres, District Centres, Local/Neighbourhood Centres and Other Commercial Locations. See also the sequential approach as set out on Volume 1, page 70 of the updated Retail Study (CDXX). The first location is the City Centre, edge of city centre followed by town, district, local/neighbourhood, edge of town, district, local/neighbourhood before consideration of commercial centre and out of centre. As Proposed Policy VC3 does already set out the sequential approach per Scottish Planning Policy (CDXX), no amendment is required.

885: The level of detail in Proposed Policy VC3 is appropriate. More detailed policy aspects will be contained in Aberdeen Planning Guidance, which will replace Supplementary Guidance. Both will be read in conjunction in the determination of planning applications. This approach accords with Planning Circular 6/2013: Development Planning (CDXX) paragraph 135 where it is anticipated that the Local Development Plan will focus on Vision, Spatial Strategy, overarching and other key policies and proposals. Other detailed material can be contained in Supplementary Guidance or non-statutory Guidance. As detailed in Issue 1: Vision, Spatial Strategy and Land Release Policy LR1 and paragraph 141 and 146 of Planning Circular 6/2013: Development Planning (CDXX), neither Aberdeen Planning Guidance nor Supplementary Guidance is dealt with at Examination.

885: The Proposed Local Development Plan, both within the Vibrant City section and Appendix 4, specify that Aberdeen Planning Guidance will be produced on Hierarchy of Centres – it is anticipated that this will fundamentally be the content of the extant Supplementary Guidance: Hierarchy of Centres (CDXX) taken forward as Aberdeen Planning Guidance. The extant Supplementary Guidance: Hierarchy of Centres (CDXX) set out the requirements of Scottish Planning Policy (CDXX) in identifying a network of centres, the hierarchy and associated sequential approach. It quite clearly, in Figure 2, identifies edge of city centre/edge of town/district centre sequentially above out of centre and commercial centre locations. It is not agreed, therefore, that Proposed Policy VC3 leaves it open that an edge of centre site could be the next option as this level of detail will be provided in Aberdeen Planning Guidance, as it is currently provided within Supplementary Guidance: Hierarchy of Centres (CDXX). Further, the Glossary definitions on pages 102 – 105 provide further detail on sequential approach, edge-of-centre, network of centres. As such no amendment to Proposed Policy VC3 is necessary.

885: Out of Centre locations are dealt with separately through Proposed Policy VC9 – Out of Centre Proposals. Criterion 4 of this Policy makes reference to locations which are accessible by active travel and regular public transport.

Policy VC4 - City Centre and Retail Core

885: Support is noted and welcomed. Proposed Policy VC4 does not stipulate every use which is permitted within the City Centre and Retail Core. It is quite clear from paragraphs 10.14-10.16 that the Proposed Local Development Plan seeks to increase the diversity of uses in the City Centre to include uses which generate significant footfall whilst promoting vitality and protecting existing Class 1 retail uses where appropriate. It would not be appropriate to provide an exhaustive list of uses as it is clear from Proposed Policy VC4 that all proposals will be assessed in accordance with the 5 criteria listed. To specifically mention food and drink would be to the omission of other uses. With reference to the

comment about Policy VC6 - this simply provides a description of the types of uses that the West End Area is currently comprised of – it does not stipulate that proposals for Class 3 uses are specifically encouraged in this area. No change to Proposed Policy VC4 is required.

912: Whilst the Main Issues Report (CDXX) section 3.7 contained a Main Issue and Options relating to a 24 Hour City this terminology has not moved forward into the Proposed Local Development Plan. Whilst the Vision for the City Centre is to ensure vibrancy and vitality throughout the day and into the evening there are no specific proposals or preclusions contained within the Proposed Local Development Plan. The level of detail/parameters sought cannot be provided as there are no specific proposals. However, what the Proposed Local Development Plan does provide is a robust policy framework to assess proposals on a case by case basis should they be submitted. Any proposal requiring planning consent would be assessed for its accordance with the entirety of the Development Plan.

913: The boundaries of the retail core were considered as a key element of the updated Retail Study (CDXX) in Volume 2 “Review of Centres” paragraph 2.81. The retail core, and indeed wider city centre boundary, remain the prime focus for all significant footfall generating development including retail in line with Scottish Planning Policy (CDXX). The Proposed Local Development Plan has taken a step change in moving away from the protected minimum retail percentages element, as seen in the retail policies of the extant Local Development Plan 2017 (CDXX), to increase flexibility of uses in alignment with the objectives of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) and to support vibrancy, vitality and viability of our existing retail centres per the updated Retail Study Volumes 1 – 3 (CDXX) (CDXX) (CDXX). Whilst non-retail uses are promoted to increase diversity of uses, the City Centre and Retail Core remains the first option for major retail developments. In light of the flexibility now offered through Proposed Policy VC1, the removal of the protected minimum retail percentages, and the updated Retail Study Volume 2 paragraphs 2.84 and 2.85) (CDXX) boundary assessment undertaken, a reduction in the retail core area is not considered necessary or appropriate. The addition of text requested is also not required as the Policy wording already makes clear that the City Centre is the preferred location for all retail, office, hotel, commercial leisure, community, cultural and other significant footfall generating development serving a city-wide or regional market. Further as both Proposed Policy VC3 and Proposed Policy VC4 address the sequential approach there is no need for additional text. See also Issue 16: City Centre General, Alternative Sites: City Centre and Urban where this rezone request is considered.

Policy VC5 - City Centre Living

629, 843: As per paragraph 10.17 of the Proposed Local Development Plan, the Council encourages an increase of additional residential development in the City Centre and specifically identifies the conversion of upper floors to help achieve this. The Proposed Local Development Plan does not specifically target empty office properties as this would limit the scope when there is already a general encouragement to revitalise and find new uses for underutilised properties. In addition, the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) identifies specific proposals for increased city centre living and intervention area allocations have been identified in the Proposed Local Development Plan at OP70, OP81, OP91, OP95, OP96, OP100, OP106 and OP110. A number of these allocations detail the increased utilisation of existing space for uses including residential.

855: Support is noted and welcomed. Proposed Policy VC5 does state there is a presumption that suitable residential amenity cannot be achieved if the proposed development is within the same built structure as 1 and/or 2. The suggested amendment is not supported as it would weaken the policy position. A balance is required to ensure a welcoming environment for residents and visitors alike and, as stated in paragraph 10.15 of the Proposed Local Development Plan, the Agent of Change principle is fundamental in supporting a mix of uses in the City Centre. Further, in all cases the applicant would still be required to demonstrate that suitable residential amenity can be achieved/maintained on a case by case basis as stipulated by the policy wording.

Policy VC6 - West End Area

932: The West End Area is a separate and distinct zoning where it is recognised that there is already a mixture of uses in a unique urban quarter with a distinct character. It is not zoned as mixed use in the Proposed Local Development Plan but the Proposed Policy encourages the area to be a focus for a variety of uses including residential as sought by the respondent. As a result of increased vacancies of office space in this location it is appropriate that a greater mix of uses be promoted to reuse vacant buildings and promote vibrancy and vitality in the area which is of a special historic and architectural character. This topic featured as Issue 16 in the Main Issues Report (CDXX) and see also Response to Main Issues Report 2019 Representations (CDXX) pages 219-221. See also Issue 16 City Centre Alternatives where this rezone request is considered.

Policy VC7 - West End Shops and Cafes

843: Support is noted and welcomed.

Reporter's conclusions:

Reporter's recommendations:

Issue 33	POLICIES VC8, VC9, VC11 AND VC12: SUPPORTING CENTRES	
Development plan reference:	Pages 87 - 89	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Aldi Stores Ltd (693) Standard Life Assurance Limited (785) Castlehill and Pittodrie Community Council (843) LSREF3 Tiger Aberdeen S.À.R.L. (C/o Ellandi LLP) (855) Nature Scot (888) Union Square Developments Ltd (Hammerson plc). (913)</p>		
Provision of the development plan to which the issue relates:	Support for the hierarchy of centres, and retail use in appropriate locations.	
Planning authority's summary of the representation(s):		
<p><u>General Support</u></p> <p>785: General support for approach taken on retailing as set out in Chapter 10 of the Proposed Local Development Plan.</p> <p><u>Extant Local Development Plan / Main Issues Report Comments</u></p> <p>785: A summary of comments previously submitted at Main Issues Report stage are repeated. Notes designation of Beach Boulevard Retail Park as a Commercial Centre within the extant Local Development Plan 2017.</p> <p><u>Policy VC8 - Town, District, Neighbourhood and Commercial Centres</u></p> <p>785: Welcome and support the recognition that Commercial Centres should contribute to providing a range of uses, and not solely restricted to retail, within Policy VC8 in accordance with Scottish Planning Policy (paragraph 63). Support safeguarding of existing centres and resisting new out-of-town retail developments.</p> <p>913: Support policy as an important component in achieving the aspirations of the Local Outcome Improvement Plan.</p> <p>913: Amend criterion two to avoid confusion, align with other policies in the 'Vibrant City' chapter and reaffirm the importance of the City Centre.</p> <p><u>Policy VC9 - Out of Centre Proposals</u></p> <p>785: Support approach set out in Policy VC9. Support safeguarding of existing centres and resisting new out-of-town retail developments.</p>		

855, 913: Support for policy.

913: The policy reaffirms the primacy of the City Centre and Retail Core in line with Scottish Planning Policy, the Aberdeen City and Shire Strategic Development Plan 2020 and Proposed Local Development Plan Policies VC3 and VC4.

693: Criterion two is not consistent with Scottish Planning Policy. The criteria is challenging to satisfy and is not consistent with Scottish Planning Policy (paragraph 73). Any slight diversions from a Town Centre would be construed as negative when Scottish Planning Policy clearly states that there must be a significant effect for a proposal to be unacceptable.

Policy VC11 - Beach and Leisure

Beach Masterplan

843: Fully support the development of a Beach Masterplan and notes the asset that the area is to the City. Support offered to help develop and promote the document with suggestions for strategy topics to be included. Comments relate to engagement with the local residential and business community, and wider Aberdeen; inclusion of the Safety Strategy for water; maintenance; retention of green space and play parks; waste and recycling strategy; and safe active travel.

888: Welcomes and supports a full Masterplan for the beach, which if done thoroughly could be very helpful. Would appreciate the opportunity to be involved if the Council does decide to go down this route.

Tourism

843: Policy supports the need to prioritise tourism per the Economic Strategy and Regional Economic Strategy. The Beach, Esplanade, Fittie and other areas of the city should be included within a further consideration to the sustainable development and management of tourism in the City to achieve a balance between economic benefits and preserving quality of life.

855: Support for policy.

913: Presumption against retail in the location is supported.

913: Policy should be updated to require any new commercial leisure proposals in this location to demonstrate that they are not capable of being accommodated within the sequentially preferable City Centre. Suggested update will not dilute the efficacy of the policy as supporting the beach as a vibrant secondary leisure space. It will ensure that new attractions commensurate with the beach area's appropriate function, which complements and supplements the City Centre, can still be supported while safeguarding the City Centre's importance as the principal regional destination for high footfall uses. Suggested amendment will enable the policy to remain consistent with all policies within the 'Vibrant City' chapter.

Policy VC12 - Retail Development Serving New Development Areas

855: Support for policy.

Modifications sought by those submitting representations:

Policy VC8 - Town, District, Neighbourhood and Commercial Centres

913: Amend criterion 2 to read: "*will not undermine the principal function of the city centre and retail core as the major regional centre or the centre in which it is located;*"

Policy VC9 - Out of Centre Proposals

693: Modify criterion two to be consistent with Scottish Planning Policy.

693: Modify criterion three to be consistent with Scottish Planning Policy.

913: Criterion 2 of the Policy is repeated within the text and should therefore be removed in the interests of clarity.

Policy VC11 - Beach and Leisure

843: Include the beach, esplanade and Fittee and other areas of the City.

913: Insert additional criterion and replace final sentence: "*5. Have been satisfactorily demonstrated that they cannot be located within the defined City Centre.*"

Replace the final sentence to read: "*Retail development will not be supported at this location.*"

Summary of responses (including reasons) by planning authority:

General Support

785: Support is noted and welcomed.

Extant Local Development Plan / Main Issues Report Comments

785: Comments submitted to the Main Issues Report (CDXX) were responded to in the Response to Main Issues Report 2019 Representations (CDXX) and this stage informed preparation of the Proposed Local Development Plan. Respondent is accurate in noting that the Links Road/Boulevard Retail area known as the Beach Boulevard Retail Park is identified as a Commercial Centre in the extant Local Development Plan 2017 (CDXX).

Policy VC8 - Town, District, Neighbourhood and Commercial Centres

785, 913: Support is noted and welcomed.

785: The Proposed Local Development Plan, in accordance with Scottish Planning Policy (CDXX) paragraph 61 and 68 identifies the Network of Centres in a hierarchy and the sequential approach which will be used to assess proposals for uses which generate significant footfall. This Policy will be supported by Aberdeen Planning Guidance, and further detail on the principles and thresholds for sequential approach for each centre type will be provided. It is not the case that each centre is equal, and the Town Centre First policy will apply as per Scottish Planning Policy (CDXX) paragraph 60.

913: Proposed Policy VC8 relates only to centres identified as Town, District, Neighbourhood and Commercial. It would therefore not be appropriate to introduce text relating to the City Centre and Retail Core when there is a separate and distinct policy solely related to City Centre and Retail Core in Proposed Policy VC4. As above, Proposed Policy VC8 will be supported by Aberdeen Planning Guidance on Hierarchy of Centres. There is no need to reaffirm/repeat the primacy of the City Centre when other policies in the Proposed Local Development Plan already do this and in assessing proposals all relevant policies will apply.

Policy VC9 - Out of Centre Proposals

785, 855, 913: Support is noted and welcomed.

693: The over-riding principle of the Vibrant City policies is the primacy of the Town Centre First approach, as is outlined by Scottish Planning Policy (CDXX) and to support the identified Hierarchy of Centres. Out-of-centre developments are contrary to this principle, therefore there is a presumption they will be refused unless proposals satisfy the criteria outlined within Proposed Policy VC9, alongside other relevant national, regional and local policy and associated guidance. Proposed Policy VC9 has a principle of refusal, whereby it has to be proven that the proposal cannot be accommodated within the tiers identified in the network of centres per Proposed Policy VC3. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) states in paragraph 3.14 in reference to the Aberdeen Western Peripheral Route junctions that "*Local Development Plans, in line with the sequential test and Town Centre First Principle, should expressly avoid any new development that would result in a negative impact on the route or any junction*". The updated Retail Study Volumes 1 - 3 (CDXX CDXX CDXX) also details the attractiveness of such locations (Volume 1, paragraph 3.56). In light of this robust strategic and local policy position, a recently completed out of town major infrastructure project, the updated Retail Study Volumes 1 – 3 (CDXX CDXX CDXX) - which provides assessment of qualitative and quantitative deficiencies (Volume 1 section 5) and a review of the designated centres (Volume 2) - it is entirely reasonable for criteria two and three to apply. The policy wording of criteria two and three have not changed from the extant Local Development Plan 2017 (CDXX) and has therefore been subject to consultation and examination – see Report of Examination Issue 21: Policies NC4, NC5, NC6, NC7, NC8 and NC9: Supporting Retail Centres (CDXX). No amendment to Policy VC9, as requested, is supported or required.

913: The repetition of criterion two is a publishing error and should be removed as a non notifiable modification.

Policy VC11 - Beach and Leisure

843, 855, 888, 913: Support is noted and welcomed.

Beach Masterplan

843, 888: Since publication of the Proposed Local Development Plan for public consultation, both at meetings of Aberdeen City Councils City Growth and Resources Committee (Item 10.1 on 3 February 2021 and Item 12.1 on 11 May 2021) and Council (Item 5.3 on 10 March 2021), the decision sheets (CDXX, CDXX and CDXX) note that there has been resolution, and £150million funding included within the General Fund

Capital Programme, to review the Aberdeen City Centre Masterplan and Delivery Programme (CDXX) and to incorporate appropriate surrounding areas including the area known as the beach. Although further details are not currently known owing to the recency of these decisions no amendments are required to the Proposed Local Development Plan as a result the wording remains relevant. It would be anticipated that public consultation will form part of the process just as it was for the extant Aberdeen City Centre Masterplan and Delivery Programme (CDXX).

Tourism

843: The Proposed Local Development Plan has introduced a new Policy VC2 specifically pertaining to Tourism and Culture. We agree that tourism is a key sector for the economy of the City and advise that proposals should be sequentially located in the City Centre unless a site is specifically allocated or activity/locality specific issues demonstrate this is impracticable. As stated in paragraph 10.9 of the Proposed Local Development Plan the Beach and Leisure Area has a separate role to play and a distinct land zoning area. Proposed Policy VC11 states that any proposals will be assessed for their impact on the amenities of nearby residents. The area specific comments may be more appropriate to be considered as part of the future review of the Aberdeen City Centre Masterplan and Delivery Programme (CDXX), and incorporation of appropriate surrounding areas including the area known as the beach. No amendment to the Beach and Leisure Area zoning is supported or required.

913: The Beach and Leisure Area is a separate and distinct policy zoning separate from the Commercial Centre zoning for the Links Road/Boulevard Retail Park. There is no need to reaffirm/repeat the primacy of the City Centre or sequential approach when other policies in the Proposed Local Development Plan already do this and in assessing proposals all relevant policies will apply. The policy wording already states that there is a presumption against retail development in this area. No additional criterion to the policy wording is supported or required.

Policy VC12 - Retail Development Serving New Development Areas

855: Support for policy is noted and welcomed.

Reporter's conclusions:

Reporter's recommendations:

Issue 34	POLICY 11: INFRASTRUCTURE DELIVERY AND PLANNING OBLIGATIONS	
Development plan reference:	Pages 90 - 92	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Dandara (711) Stewart Milne Homes (717) Sportscotland (746) NHS Grampian (882) NatureScot (888) Barratt North Scotland (891) Homes for Scotland (897) CALA Homes (North) Ltd (900)</p>		
Provision of the development plan to which the issue relates:	Infrastructure requirements for new developments, including developer obligations.	
Planning authority's summary of the representation(s):		
<p><u>Circular 3/2012 Planning Obligations and Good Neighbour Agreements</u></p> <p>897: The respondent refers to the five tests set out Circular 3/2012 paragraph 14 for developer obligations and asserts that the presentation of the contributions sought without any justification does not allow for meaningful consultation on this aspect of the Proposed Local Development Plan. The respondent refers to the Strategic Transportation Fund/Elsick Supreme Court Decision and that the ruling stated it must be demonstrated that the link between the obligation sought and the contribution is more than trivial. The lack of information provided again precludes this assessment.</p> <p>717: The Policy should quote the tests of Circular 3/2012. The Policy should make it clear that Planning Obligations should only be sought where all of the tests are met. Obligations must always be related and proportionate in scale and kind to the development in question. Planning Obligations are being sought on nearly every development, and often when there is a pre-existing capacity, particularly for healthcare and education. Where pre-existing capacity exists within a facility or infrastructure the development should be allowed to utilise the spare capacity.</p> <p>717: The respondent considers that developers should not be required to enter into planning obligations. Negotiating planning obligations and Section 75 agreements delays the delivery of development which is contrary to Circular 3/2012.</p> <p>891: The respondent considers reference to Circular 3/2012 should be contained within the Policy. The Policy and any associated guidance should also make it clear that Planning Obligations should only be sought where all of the tests are met and highlight the relevant wording of the Circular which requires obligations to be proportionate in scale and kind to the proposed development.</p>		

Support for the Policy

746: The respondent supports paragraph 11.5 which states what contributions may be sought for. It is important that consideration of new demand for spaces for sport and physical activity are considered when assessing the impact of new development. Policy and supporting text reflects this need.

Healthcare

711: The respondent objects to requirement for developments to contribute to delivery of healthcare facilities. Many GP practices and Dentists operate from privately owned facilities and it would be unacceptable and inappropriate for the development industry to subsidise extensions. Healthcare is funded by Central Government through taxation and differs from locally funded infrastructure such as roads and education. It is unacceptable that the industry should be expected to provide land for such facilities at nil cost.

717: There are no grounds for contributions to health care provision. Many health care facilities are commercial ventures. Health care is funded by Central Government via taxation. The development industry should not subsidise the National Health Service.

897: The respondent objects to the Council seeking development contributions from future development towards healthcare provision. While the respondent supports a well-functioning and resourced healthcare system it is asserted that many GPs operate as private business and they view contributions towards such practitioners as subsidising private enterprise. Healthcare should be funded through general taxation. The respondent goes on to discuss the delivery challenges of healthcare and that it is outwith the control and responsibility of Council. As such, it is questioned how the Council could fairly collect and distribute any funds.

900: The respondent considers that primary healthcare is provided in part by private contractors, some who will occupy NHS owned facilities and others who will own their own facilities. It is important to differentiate between these two as funding to extend or improve facilities for which the continued use and running depend on a private business is not an appropriate use of developer obligations.

882: The respondent makes comments to the provision of healthcare infrastructure to a number of Masterplan Zones; Dubford and Cloverhill, Grandhome, Stoneywood, Newhills expansion, Greenferns, Maidencraig/Kingswells, Countesswells, Oldfold and Loirston the respondent welcomes the inclusion of reference to health in Section 4 Monitoring and Review Infrastructure Planning and Delivery it considers the information provided to be too prescriptive. As such greater flexibility is required and amendments to the wording of table 'Infrastructure Requirements from Masterplan Zones' table found on page 41-43 of the Proposed Local Development Plan. The respondent emphasises that statements should be more general, for example "*additional professional roles to support the health and care needs of the population*" are more appropriate going forward.

Section 4 - Infrastructure Delivery and Planning Obligations

711: Object to infrastructure requirements for Stoneywood being in the Proposed Local Development Plan as the site will be complete by the time the Proposed Local Development Plan is adopted and as such it is inappropriate for the Proposed Local

Development Plan to refer to infrastructure requirements from it. There is a signed Section 75 legal agreement which secures obligations from the development. Roads improvements referenced at page 41 of the Proposed Local Development Plan have been delivered. There is no need for obligations to be referenced in the Proposed Local Development Plan.

897: The respondent argues that the thresholds and circumstances where contributions will be sought are unusually not set out the referenced Policy itself but instead in the preceding paragraph 11.5. As such modification of paragraph 11.5 is suggested. The respondent goes on to state they do not agree with the threshold for providing contributions and that this should be raised from five homes to 12 homes in order to support small home builders and job creation.

900: The respondent notes that Policy I1 states that the infrastructure requirements related to masterplan zones and allocated sites is “set out below.” Paragraph 11.6 of the Proposed Local Development Plan then states that for Masterplan Zones this is set out in Section 4 and that any other development will need to provide infrastructure based on the criteria listed in the Supplementary Guidance.

The respondent interprets that Policy I1 does not list the types of infrastructure that contributions are required for. Only that this is the infrastructure, services and facilities to deliver the scale and type of developments proposed and that this will consider cumulative impact.

The respondent interprets that Section 4 provides an indication of infrastructure needed for Masterplan development zones.

Green and Blue Infrastructure Provision

888: Respondent wishes to see greater recognition of potential green infrastructure requirements within Section 4 of the Proposed Local Development Plan. Respondent believes this can be achieved relatively simply by the addition of a new sub-heading within the table at paragraph 4.3. Respondent recommends inclusion of a new sub-heading within the table on ‘Infrastructure Requirements from Masterplan Zones’, at paragraph 4.3 of the plan. The new sub-heading should be entitled “Green and Blue Infrastructure”, and under this, for “All ”Development/Masterplan’, respondent suggests that the entry might include wording such as: *“New developments will include an extensive green network across the site that will extend and link to the existing Core Path and habitat networks. Contributions may be sought for green and blue infrastructure assets including biodiverse open space that may lie outside the site but connect to, or form part of, the extended local habitat network.”*

Respondent notes that there is discussion of developer contributions towards green and blue infrastructure in the Reporter’s conclusions at page 44 of the Examination Report for the Aberdeen City and Shire Strategic Development Plan 2020. The Reporter acknowledges that such contributions are important and states that *“The local development plans and any associated supplementary guidance could suitably identify the circumstances in which any green and blue infrastructure was required”*.

Section 4 - Infrastructure Requirements for Master Plans Zones

888: The respondent considers that each of the Masterplan Zones has an existing Development Framework covering most, or all, of that Zone. The exception is the first of the Zones, Dubford and Murcar which is a partially new allocation. For consistency (as well as good 'Masterplanning' reasons) it would also make sense for the Council to also seek a Development Framework for the Dubford and Murcar Masterplan Zone. The need for such a Development Framework could potentially be stated at paragraph 11.6 or 11.7, and also, for each of the relevant Opportunity Sites within Appendix 2. It could also be included in the list at Appendix 3.

It is suggested that a key issue for such a Framework could be how good green / active travel links could be developed through to the adjacent coastal area, so that access and recreation use are managed in a sensitive way and the best use could be made of this natural asset. The respondent considers this may be the type of issue that could benefit from future identification of specific developer requirements for green and blue infrastructure, including offsite (as discussed in our separate representation for paragraph 4.3 of the Plan).

The respondent refers to paragraph 11.6 of the Proposed Local Development Plan and suggests that it may be helpful for this paragraph to explain further what "*prepare Masterplans for each zone*" means. The respondent queries the paragraphs meaning as to the level of detail of a Masterplan or if it is to be a Development Framework that is required.

Supplementary Guidance

891: The respondent notes concern over the lack of detail on the methodologies to be used in calculating developer obligations in relation to proposed housing development. Where, how, in what circumstances, and why obligations will be sought should be clear and subject to scrutiny at the examination of the Proposed Local Development Plan.

The Proposed Policy as worded fails to do this, which runs contrary to Circular 6/2013, which states that such matters (amongst other things) "*should not be included in Supplementary Guidance, but be within the plan*" and goes on to clarify that this includes, "*items for which financial or other contributions, including affordable housing, will be sought, and the circumstances (locations, types of development) where they will be sought.*" (paragraph 139).

The respondent considers that this detail could form an Appendix to the Policy, rather than separate, unadopted Planning Advice. At present however, the methodologies have not been subject to any scrutiny through the preparation of the Proposed Local Development Plan and the respondent objects to this.

Clarity should be provided over the statutory weight to be afforded to the associated Supplementary Guidance. Page 124 notes that Appendix 4 – Aberdeen Planning Policy will contain Supplementary Guidance on Planning Obligations, disappointingly however this is not available as part of this consultation.

897: The respondent objects to what is asserted to be an open-ended list of areas for contributions may be sought. The respondent refers to Circular 6/2013 paragraph 139 should not be included in Supplementary Guidance, but be within the Plan "*items for which financial or other contributions, including affordable housing, will be sought, and the circumstances (locations, types of development) where they will be sought.*" And that the

Proposed Local Development Plan is not in line with the Circular. The respondent sets out that there should be greater clarity as to the developer obligations which are to be sought so that they can be scrutinised in during the Proposed Local Development Plan's Examination in Public and that Policy I1 fails to do this.

Transport Infrastructure

900: The respondent considers Policy T1 which states that the transport intervention options will be subject to further relevant detailed appraisal and design work, which will inform the requirements for planning obligations for their appraisal and or delivery. In section 4 it states that "*Contributions required in order to address the cumulative impact of development on the transport network. Possible issues to be resolved / schemes are listed in Supplementary Guidance and further detailed work is required to establish whether these are the most appropriate solutions for each development.*" The respondent considers that there is insufficient clarity on the expectations for developer obligations and the costs associated with these.

Modifications sought by those submitting representations:

Healthcare

717: The respondent requests that Policy I1: Infrastructure Delivery and Planning Obligations be amended so that the supporting text and associated supplementary guidance removes reference to contributions to healthcare.

717: The respondent requests that Policy I1: Infrastructure Delivery and Planning Obligations reference the tests for developer obligations set out in Circular 3/2012. It should be highlighted that contributions must always be related and proportionate in scale and kind to the development in question. It should be recognised many housing land releases identified in 2012 have consent and the Section 75 agreements have been concluded. No addition requirements will be sought.

882: In respect of Dubford and Cloverhill (OP10 and OP2), the Proposed Local Development Plan, at page 42 states that contributions are required towards an "*Extension to Oldmachar Medical Practice at Jesmond Road to accommodate two additional GP's. Extension at Bridge of Don Dental Clinic at Cairnfold Road to accommodate General Dental services for one additional dental chair. One new Community Pharmacy*". However, it is requested that this is amended to read "*Extension to existing health facilities to support General Medical Services and additional dental capacity. An additional pharmacy facility may also be required*".

882: In respect of Grandhome (OP9), the Proposed Local Development Plan, at page 42, states that contributions are required towards "*New 16 GP Health Centre to accommodate existing four GP Practice with 12 additional GP's. Two new six chair Dental Surgeries. Four new Community Pharmacies*". However, it is requested that this is amended to read "*New Health Centre to support General Medical Services and additional dental capacity. Additional pharmacy facilities will also be required.*"

882: In respect of Stoneywood, the Proposed Local Development Plan, at page 42, states that "*New 10 GP Health Centre (including land) to accommodate eight existing GP's with two additional GP's. Extension of Dyce Health Centre to accommodate two additional dental chairs. This facility could be included as part of the required new Health Centre, as*

specified above. One new Community Pharmacy". However, it is requested that this is amended to read "New Health Centre to support General Medical Services and additional dental capacity. An additional pharmacy facility may also be required".

882: In respect of Newhills Expansion (OP20, OP21 and OP22), the Proposed Local Development Plan, at page 42, states that *"New 13 GP Health Centre (including land) to accommodate 6 existing GPs with seven additional GPs. New six chair Dental Surgery. This facility could be included as part of the required new Health Centre, as specified above. Three new Community Pharmacies"*. However, it is requested that this is amended to read *"New Health Centre to support General Medical Services and additional dental capacity. Additional pharmacy facilities will also be required"*.

882: In respect of Greenferns (OP28 and OP33), the Proposed Local Development Plan, at page 42, states that *"New six GP Health Centre (including land already identified) to accommodate four existing GPs with two additional GPs. Two additional dental chairs required in Health Centre, as specified above"*. However, it is requested that this is amended to read *"New Health Centre to support General Medical Services and additional dental capacity. Additional pharmacy facilities may also be required"*.

882: In respect of Oldfold (OP48), the Proposed Local Development Plan, at page 43, states that *"Extension to Peterculter Health Centre to accommodate one additional GP. Extension of Peterculter Health Centre to accommodate two additional Dental Chairs. One new Community Pharmacy"*. However, it is requested that this is amended to read *"Extension to the existing Health Centre to support the General Medical Services for the increased population in the Peterculter community"*.

882: In respect of Loirston (OP59), the Proposed Local Development Plan, at page 43, states that *"Extension to Cove Bay Health Centre to accommodate three additional new GPs. Extension at Cove Bay Health Centre to accommodate two additional Dental Chairs. One new Community Pharmacy"*. However, it is requested that this is amended to read *"Extension to the existing Health Centre to support the General Medical Services for the increased population in the Cove community and additional dental capacity. Additional pharmacy facilities will also be required"*.

Infrastructure Requirements for Master Plan Zones

888: The respondent requests the Proposed Local Development Plan is amended as follows: The new sub-heading should be entitled *"Green and Blue Infrastructure"*, and under this, for all 'Development/Masterplans', the respondent suggests that the entry might include wording such as: *"New developments will include an extensive green network across the site that will extend and link to the existing Core Path and habitat networks. Contributions may be sought for green and blue infrastructure assets including biodiverse open space that may lie outside the site but connect to, or form part of, the extended local habitat network."*

888: The respondent recommends that the Council clarifies what is meant by *"developers will be expected to work together to prepare masterplans for each zone"* within Proposed Local Development Plan paragraph 11.6.

888: The respondent recommends that the Council considers stating the need for a Development Framework covering the first of the Masterplan Zones listed at paragraph

11.7. This could then also be stated for each of the relevant allocations at Appendix 2 and also stated in the list at Appendix 3.

711: The respondent requests that Section 4 - Infrastructure Delivery for Developments of the Proposed Local Development Plan be modified to remove reference to contributions from Stoneywood.

891: The respondent requests that paragraph 11.5 of Policy I1 – Infrastructure Delivery and Planning Obligations be modified as follows: “*Contributions will be sought, where necessary, for the following infrastructure assets where a requirement is established: transportation, core paths, education, open space including public realm, community facilities and sports and recreation. Further guidance is provided on how monies are managed and secured, development viability, preapplication discussions and indexation. The following summarises the types of development expected to require obligations: - Residential Development: All proposals which involve the creation of 12 units or more; Commercial Development: All developments where the floorspace exceeds 1,000 square metres or the site area is more than 1 hectare; and - Other applications where the Officer considers the proposal to be of a scale or type of development appropriate to consult for Developer Obligations*”.

900: The respondent requests that Policy I1 Infrastructure Delivery and Planning Obligations it should be modified to provide clarity on the infrastructure that will be considered and how this will be assessed. The Policy should also be clear that funds should only be used for public infrastructure and not for investing in private owned facilities. An assessment should also be undertaken of the impact of the anticipated developer obligations on development viability to ensure that these aspirations are deliverable. If not, then the policy and strategy require to be reconsidered.

Reference to Circular 3/2012 Planning obligations and good neighbour agreements

891: The respondent requests that Policy I1: Infrastructure Delivery and Planning Obligations should be amended to include appropriate reference to Circular 3/2012 and the associated tests contained therein. It should be highlighted that contributions “...*must always be related and proportionate in scale and kind to the development in question as set out in Circular 3/2012*”.

Supplementary Guidance

891: Clarity should be provided over the statutory weight to be afforded to the associated Supplementary Guidance. Page 124 notes that Appendix 4 – Aberdeen Planning Policy will contain Supplementary Guidance on Planning Obligations, disappointingly however this is not available as part of this consultation.

Summary of responses (including reasons) by planning authority:

Circular 03/2012

711, 717, 891, 897: The issue of referencing Circular 03/2012 Planning obligations and good neighbour agreements was considered at the Examination into the extant Local Development Plan 2017 (Issue 22) (CD XX). Paragraph 3 of the Reporter’s conclusions states “*A number of representations seek an explicit reference to Circular 3/2012 and in particular to the requirement that planning obligations must fairly and reasonably relate in*

scale and kind to the proposed development. The proposed plan, however, does not stand alone but has to be read in the context of Scottish Government policies, including a number of relevant circulars and other policy documents. This is recognised in paragraph 1.11 of the proposed plan. It would be anomalous to single out one particular circular for mention in the text, and the reference could become out of date if the circular were superseded during the lifetime of the plan". As such this matter was addressed through the Examination of the extant Local Development Plan 2017 and the point raised in the representations to the Proposed Local Development Plan repeat that which was previously addressed

It is agreed that developer contributions can only be sought where they comply with the requirements of Circular 03/2012 Planning Obligations and Good Neighbour Agreements (CD XX). Circular 03/2012 (CD XX) paragraph 2 (page 2) states "*Planning authorities should promote obligations in strict compliance with the tests set out in the circular*". The Council considers it inappropriate and unnecessary to repeat the contents of Scottish Planning Policy (CD XX) or Scottish Government circulars or refer to them explicitly in the policy or supporting text. This would lead to unnecessary repetition and the references could become outdated within the five-year lifespan of the Local Development Plan. Furthermore, given that a new planning system is emerging from the Planning (Scotland) Act 2019 is it possible there will be revised circulars to inform the new policy context.

The Proposed Local Development Plan's Policy I1 Infrastructure Delivery and Planning Obligations is clear that the level of provision required will relate to the development proposed either directly or to the cumulative impact of development in the area and be commensurate to its scale and impact. This is in line with Circular 03/2012 (CD XX). There is no relationship between this Policy's wording and the now quashed Strategic Transportation Fund which was a regional piece of Supplementary Planning Guidance.

Paragraph 32 (Page 10) of Circular 03/2012 (CD XX) recommends that methods and exact levels of contributions should be included in Supplementary Guidance and this is the approach taken with both the extant Local Development Plan 2017 and the Proposed Local Development Plan. Opportunities for discussion about the precise need for infrastructure and the process for delivery are identified in both the Proposed Local Development Plan and the Proposed Delivery Programme.

Information relating to infrastructure requirements and developer contributions is set out clearly in three parts in the Proposed Local Development Plan; In Section 4 (Page 41), the Delivery Programme, and the Masterplans and Supplementary Guidance listed in Appendices 4 and 5. Many of the Masterplan areas have undergone extensive consultation with landowners and developers on the subject of infrastructure requirements and such requirements have been set out in the Proposed Local Development Plan's Section 4, the Masterplans themselves, and through existing legal agreements.

Paragraph 11.5 of the preamble to Proposed Policy I1 sets out in general where necessary infrastructure contributions will be sought for including (but not limited to): transportation, core paths, education, healthcare, open space including public realm, community facilities and sports and recreation. It is further stated in paragraph 2 of Policy I1 that "*Infrastructure requirements and the level of contributions will be required to be agreed with the Council in consultation with the accompanying Supplementary Guidance*". Therefore the scope of what contributions will be sought for is quite clear and the parameters for such contributions are informed by the circular.

Contrary to the assertions of respondent 717, planning obligations are not sought in cases where existing infrastructure such as schools and healthcare facilities have capacity to absorb the impact of new development. Development proposals are assessed on merit at the time of planning application and planning obligations are determined accordingly. Measures such as template legal agreements are also used wherever possible to avoid unnecessary delays associated with planning obligations.

Support

746: Support for the principle of the approach taken by Aberdeen City Council in assessing infrastructure requirements associated with new development and publishing these in the Proposed Local Development Plan and Proposed Delivery Programme is noted and welcomed.

Healthcare

711, 717, 897, 922: This matter was considered through the Examination into the extant Local Development Plan 2017 (Issue 22, 'Reporter's conclusions' paragraph 38 onwards) (CD XX) and also in the Examination of the Local Development Plan 2012 where it was concluded by the Reporter that it was established that contributions towards healthcare facilities was acceptable and met the tests of circulars.

The respondents are minded that contributions towards healthcare facilities is inappropriate given some healthcare facilities can be privately run. Such contributions would therefore be a form of subsidisation of private enterprise.

There are policies and guidance in place at local, regional and national level to ensure that new development mitigates against its impacts and all proposals are expected to conform to these. The requirement for healthcare facilities contributions meets the policy tests as set out in Circular 03/2012: Planning Obligations and Good Neighbour Agreements (CD XX) and the principle of contributions towards healthcare facilities is clearly set out in the Proposed Local Development Plan and Delivery Programme. Further detail is to be provided through the update of Supplementary Guidance: Planning Obligations, which will undergo a period of consultation in public.

The methodology and approach of the current and future Supplementary Guidance will ensure that there is a clear link between development and the proposed contributions, basing this on guidance documents such as Scottish Health Planning Notes, the General Medical Services (GMS) Premises directions and the Quality and Efficiency document produced by Scottish futures Trust.

Responsibility for the National Health Services in Scotland is a devolved matter and therefore rests with the Scottish Government. The Scottish Government allocates health care funding to the 14 NHS Territorial Boards covering the whole of Scotland and the seven national or 'special' NHS Boards. The Scottish Government sets national objectives and priorities for the NHS, signs delivery plans with each NHS Board and Special NHS Board, monitors performance, and supports Boards to ensure achievement of these key objectives. The NHS Boards in Scotland plan, commission and deliver NHS services for their populations. The majority of new healthcare facilities are being delivered and funded by the local health board (NHS Grampian).

Given the above; where there are clear and statutory requirements placed on the NHS to provide healthcare and similarly on Local Authorities to provide public services, such as education and social care, there is no difference between contributions to health, community, education etc as long as it meets the criteria set out in the Circular 03/2012 (CD XX). All developers will be required, where necessary, to contribute towards their provision, in order to mitigate the impact of development.

New development places additional requirements on existing healthcare infrastructure. Additional population growth within an area, results in additional residents utilising healthcare facilities, generating a requirement for additional capacity. Developer contributions are therefore sought to mitigate the impact of development where an existing healthcare facility (either general GP medical service, dental facility, community pharmacy) is at capacity or the scale of the development would trigger the requirement for such a facility. Contributions are solely identified for capital works for the provision of additional capacity (e.g. extension to an existing health centre) and are not used for any associated revenue costs or furniture costs of which other funding is directed towards.

Developer contributions for healthcare facilities are held by the Local Authority and drawn down by NHS Grampian when required. Prior to the release of funds the Local Authority would review the details of the proposed project to ensure that it met the relevant criteria and ensure all appropriate invoices and paperwork are provided, in line with normal practice.

These contributions recognise the wider remit of contributions that are required as a result of new development. It is acceptable to include contributions towards health care provision (in terms of capital costs) due to the impact that new development has on healthcare facilities.

The fact that health facilities are sometimes in private ownership does not prevent contributions being sought towards such facilities in principle. Claw back clauses or other specific measures can be included within legal agreements if it is necessary to mitigate any risk associated with such buildings being subsequently sold or ceasing to operate as healthcare facilities. This issue has been considered in recent planning appeals. For example, the Notice of Intention for planning appeal PPA-110-2370 (CD XX) for a site in Aberdeenshire commented on this issue in principle. The Reporter stated that: *"It is common for doctors' surgeries to privately owned, but their function funded by the NHS. I have not been directed to any specific text within Circular 3/2012 which would prevent contributions being sought in these circumstances, and I have not been able to identify any such provisions myself"* (paragraph 40). The Reporter went on to comment that: *"I can see no reason why a contribution could not legitimately be sought to enable the NHS to address any physical capacity issues ... regardless of the building's ownership"* (paragraph 41).

882: NHS Grampian makes comments to the provision of healthcare infrastructure to a number of masterplan zones. Discussions with NHS Grampian have established a clear need for enhanced healthcare facilities in order to accommodate the additional patients that will be generated by development within the Masterplan Zones. However, the respondent requests that statements should be more general which would seem to offer greater flexibility for future healthcare provision planning to be tailored to a community's future needs should the reporter be so minded.

Section 4 - Infrastructure Delivery and Planning Obligations

711: The respondent objects to references made to Stoneywood in Section 4 of the Proposed Local Development Plan. Paragraph 11.7 of the Proposed Local Development Plan acknowledges the advanced stage of the Stoneywood development which is almost at completion. However specific reference is made to infrastructure contributions related to the delivery of Stoneywood as at the time of publication of the Proposed Local Development Plan the delivery was ongoing and some planning obligations remained outstanding.

897: The infrastructure requirements set out in Section 4 of the Proposed Local Development Plan is not an open-ended list. The table factually sets out requirements which have been agreed through development and adoption of Masterplans, what is included in legal agreements and also set out in previous and the Proposed Local Development Plan Delivery Programme (CDXX). The table also sets out which parties are responsible for delivery.

The Council does not agree with the respondent's suggestion that the threshold for contributions should be increased from five homes to 12 homes. All new development creates an increased need and use infrastructure and services and it is therefore right that contributions are made towards these. The threshold of five homes is sufficient to enable small home builders to undertake small scale and bespoke development without contributions. To increase the threshold would mean that a significant number of windfall sites and even allocated sites would not make contributions and could even lead to a reduction in density on some sites in order to fall below the threshold.

900: Paragraph 11.5 sets out the types of infrastructure which require development contributions. Reference is indeed made to the infrastructure needed to bring masterplan sites forwards and that these may be cumulative given the scale of the sites and that multiple developers will deliver these sites. Finally, further details, as has always been the case, is to be set out in Supplementary Guidance: Planning Obligations.

Green and Blue Infrastructure Provision

888: There is consideration for Green and Blue Infrastructure under Proposed Policy NE2 in the Proposed Local Development Plan. This has been further validated by work undertaken by the Scottish Infrastructure Commission (CDXX) and reference in the Scottish Government's National Planning Framework autumn statement (CDXX) to the benefits of green and blue infrastructure and how future policy will promote it. However, it is not considered appropriate at this point in time to amend the Proposed Local Development Plan's Table on Infrastructure Requirements from Masterplan Zones as the policy context to consider such requirements is not considered robust enough at present.

Section 4 - Infrastructure Requirements for Master Plans Zones

888: The respondent's reference to Dubford and Murcar not having an existing Masterplan is at the time of submission partially correct. Dubford Development Framework (CD XX) has been adopted by Aberdeen City Council. The partially new allocation which the respondent refers to is assumed to refer to the Cloverhill allocation. Planning permission in principle 191171 granted permission subject to Matters Specified in Conditions for; Erection of residential led, mixed use development of approximately 550 homes, community and sports facilities, retail (Classes 1, 2, 3 and Sui Generis) with associated landscaping, open space and infrastructure. Condition 2 of the permission makes specific

reference to detailed phasing of the delivery of the development. A masterplan was submitted as part of the assessment of PPP 191171 in line with the requirements of the extant Local Development Plan 2017 Policy H4 Housing Mix and Need. The Council does not consider it necessary to include Cloverhill in the Masterplan Zones of the Proposed Local Development and that the conditions governing its delivery adequately ensure consideration of issues relating to green and blue infrastructure such as de-culverting waterways, active travel routes and provision of SUDS.

The Council does not consider it necessary to offer further explanation as to the meaning of paragraph 11.6 of the Proposed Local Development Plan given the publication of the Technical Advice Note Aberdeen Masterplanning Process (CD XX) which will be reviewed and taken forward as Aberdeen Planning Guidance after the Examination.

Supplementary Guidance

891, 897: The respondents assert that the Proposed Local Development Plan is not in line with Circular 6/2013 Development Planning (CD XX).

This matter was considered in the Report of Examination for the extant Local Development Plan 2017 (Issues XX, CD XX). Paragraph 5 of the Reporter's conclusions stated "*It also appears to me that the split between Policy I1 and the SG is consistent with the guidance set out in Circular 6/2013: Development Planning*".

Paragraph 139 of the Circular refers to what should not be included in Supplementary Guidance. The respondent makes specific reference to financial or other contributions such as affordable housing contributions and that they should not be included in Supplementary Guidance. At no point in the Proposed Local Development Plan Policy I1 or Section 4 Infrastructure and Planning Obligations is reference made to affordable housing. Reference is not made to affordable housing in the extant Supplementary Guidance: Planning Obligations (CD XX) nor would it be in any subsequent Supplementary Guidance relating to Planning Obligations. Affordable housing requirements are clearly set out in Policy H5 of the Proposed Local Development Plan. There is no need to amend the wording of paragraph 11.5 of the Proposed Local Development Plan which is quite clear on the items which contributions will be sought towards and the parameters of where planning contributions will be sought, and that there is an obligation contained within the Proposed Local Development Plan that this will be further consulted upon through the production of Supplementary Guidance. Furthermore, it is specifically stated in Paragraph 139 of Circular 6/2013 that it is suitable to include in Supplementary Guidance "*exact levels of developer contributions or methodologies for their calculation*" which has been set out in the Proposed Local Development Plan and in this response clearly the intention of the Council.

891: The respondent's concern over asserted lack of detail is baseless given such details relating to the methodologies to be used in calculating developer obligations in relation to proposed housing developments has consistently been set out in Supplementary Guidance. This has been the case for the Local Development Plan 2012, the extant Local Development Plan 2017 and the Proposed Local Development Plan. The signposting and framework for such is clearly set out in the Proposed Local Development Plan and is aligned with Circulars 6/2013 (CD XX) and 03/2012 (CD XX). Therefore, it is not necessary to include such methodologies as an appendix to the Proposed Policy nor would to do so be in line with the Circulars. There will be a consultation period on any Supplementary Guidance or Aberdeen Planning Guidance which supports the Proposed

Local Development Plan. The statutory weight given to the Supplementary Guidance will be that of Local Development Plan which is used to inform determinations of planning applications. This is in line with paragraph 23 of Circular 03/2012 which states “*Broad principles, including the items for which contributions will be sought and the occasions when they will be sought should be set out in the SDP or LDP, where they will have been subject to scrutiny at examination. Methods and exact levels of contributions should be included in statutory supplementary guidance*”.

Transport Infrastructure

900: Proposed Policy T1 makes reference to the Summary of Transport Intervention Options as set out in the Proposed Local Development Plan. The interventions have come from previous Cumulative Transport Appraisals (CDXX) undertaken in support of Aberdeen City and Shire Strategic Development Plans (CDXX and CD XX). While the interventions are currently considered required to mitigate the impact of future development, schemes will need to be tested to determine further details. Assessment such as Scottish Transport Appraisal Guidance would need to be undertaken before the viability and requirements of schemes could be determined. Therefore, further transport intervention options will be subject to further relevant detailed appraisal and design work, which will inform the requirements for planning obligations for their appraisal and or delivery.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 35	POLICIES T1, T2, T3: TRANSPORT AND ACCESSIBILITY	
Development plan reference:	Pages 92 - 95, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Sangeeta Maini (110) Daniel Underwood (117) Dr Huang (126) Alan and Louise Gerrard (166) Alan Gerrard (167) Dewe Allness (176) Electric Vehicle Association Scotland (193) Adam Gray (245) Andrew Page (266) Steven Forbes (565) Bill Roadnight (570) Gail Fisher (599) Michael Jack (629) Fraser Ford (694) Fabrizio Oddo (707) Stuart Milne Homes (717) Anne Jessieman (735) Ian McCall of Paths for All (762) Lindsey Imray (767) Scottish Hydro Electric Transmission plc (768) Aberdeen International Airport (788) Network Rail (790) Kenny Murphy (839) Castlehill and Pittodrie Community Council (843) NESTRANS (880) Scottish Government (885) Opportunity North East (887) Barratt North Scotland (891) Homes for Scotland (897) CALA Homes (North) Ltd (900) Aberdeen Harbour Board (910) Sandra Borthwick (927) The Grandhome Trust (959) Richard Harwood (1153) Michael Duguid (1173) Mr and Mrs Bjorkelund (1190)</p>		
Provision of the development plan to which the issue relates:	Assess and manage transports impacts of new developments; support and encourage active and sustainable travel	
Planning authority's summary of the representation(s):		

General Transport

762: Welcomes reference to climate change, National Planning Framework 4, Public Health Priorities for Scotland and Sustainable Development Goals. Welcomes active travel requirements and the importance of health and wellbeing in the Proposed Local Development Plan. Suggests the Plan should make reference to the National Transport Strategy, National Walking Strategy, Cycling Action Plan for Scotland and the Long-term Vision for Active Travel in Scotland. Requests stronger emphasis be made on the transport hierarchy. Suggests there should be no new 'out of town' development and there should be a repurposing of city and town centres.

788: Welcomes proposal to deliver transformation in public transport provision and requests to be fully engaged in the process. Respondent notes the Airport Masterplan, Surface Access and Carbon Management Strategies help promote more sustainable surface transport policies.

843: There must not be a detrimental impact on the environment or on those living and travelling near potential rail lines. Notes importance of connectivity between communities through central hubs and commission routes. Welcomes recommendation to connect Regional Centre, Town Centre, District Centres, Neighbourhood Centres and Commercial Centres. Suggests this should be extended to include communities with a required need and rural locations.

880: Supports the Proposed Local Development Plan's consideration of future transport requirements through the Cumulative Transport Appraisal and the principles of Chapter 11 which mirror the emerging Regional Transport Strategy 2040.

885: Consideration should be given to freight in this Section of the Proposed Local Development Plan, specifically given the Aberdeen Harbour expansion plans.

Aberdeen Western Peripheral Route

245: Aberdeen Western Peripheral Route took too long to development and complete.

570: In context of future housing release at OP21 and OP22 there will be additional pressure on the Aberdeen Western Peripheral Route to travel south from the Kingswells North junction on the C89C (Fairley Road). Existing housing in Bucksburn would use this rather than add to traffic accessing the Aberdeen Western Peripheral Route at Airport junction. Residents of Kingswells would rather access the Aberdeen Western Peripheral Route here than battle traffic going to the "Kingsford" junction. Additional access to the Aberdeen Western Peripheral Route can be accommodated at the C89C roundabout. Existing topography is suitable for ramp. It was argued there was not enough distance between the "Kingsford" junction and this one. Additional access here would reduce distance needed to join the Aberdeen Western Peripheral Route. Traffic volumes would justify the cost to the Government of this work. Transport Scotland need to be made aware of this.

Transport Intervention Options

885: Representation relates to Proposed Local Development Plan page 93. The Aberdeen City and Shire Strategic Development Plan 2020 was supported by a Cumulative Transport Appraisal 2018 which included interventions to mitigate for the level of

development in the Strategic Development Plan. Following discussions with the respondent, these interventions were included in the Proposed Local Development Plan to mitigate additional development in the Aberdeen City and Shire Strategic Development Plan 2020. The respondent is concerned about previously allocated and approved strategic developments included in housing allowances in the Aberdeen City and Shire Structure Plan 2009 and the Aberdeen City and Shire Strategic Development Plan 2014. These were assessed by the Cumulative Transport Appraisal 2010 and allocated in the Local Development Plan 2012 and the extant Local Development Plan 2017. Transport interventions to mitigate these allocations were set out in the Cumulative Travel Appraisal 2010 and the mechanism to collect funding for their delivery was the Aberdeen City and Shire Strategic Development Plan 2014 Strategic Transportation Fund Supplementary Guidance which has been quashed.

Respondent queries future funding and delivery of these interventions. Support was given for the approval of the planning applications for the strategic allocations on the basis that necessary interventions would be funded through developer obligations. Respondent is concerned about the upgrade of Kingswells North Junction with south facing slips and improved capacity at the A96/Dyce Drive/Craibstone access.

Respondent also considers that the Proposed Local Development Plan should detail the Cumulative Travel Appraisal 2010 schemes that will be included within future monitoring and appraisal to determine what schemes are needed, their timing and delivery. Consideration should not just be given to schemes from Package 1 of the Cumulative Travel Appraisal 2019 – these schemes are required for the delivery of the Proposed Local Development Plan as they are included within the Aberdeen City and Shire Strategic Development Plan 2020's Cumulative Travel Appraisal 2019 Reference Case Scenario.

Policy T1 - Land for Transport

General

790: Supports policy provisions. Respondent requires continued support of local authority continued support of the local authority in safeguarding and improving the railway network. Requests policy wording provides for the general use of land to support future strategic improvements to railway infrastructure. Requests designation of land at Dyce Railway Station provides for future railway use. Respondent would like to be involved in the production of development policy and associated guidance that discusses level crossing safety.

887: Supports policy. Requests City Wide Proposal's Map is updated to include Aberdeen Harbour South future transport links as Land for Transport. Note that the Proposed Local Development Plan does not reflect the current Scottish Transport Appraisal Guidance (STAG) appraisal undertaken for Aberdeen Harbour South which is important in the context of the emerging Energy Transition Zone.

910: Requests further bullet point is added relating to Aberdeen South Harbour and its future expansion including the Energy Transition Zone.

South College Street Improvements Objections

110, 126, 565, 599, 735, 767: Does not support project.

110, 735, 767: Concern over increase in emissions and (694, 927) noise pollution.

126, 565, 599, 694, 735, 1153: concern over increase in traffic and air pollution.

126: Notes links between air pollution and respiratory conditions. Such links have been shown through the pandemic to affect BAME populations more acutely.

565, 735, 767: Concern over increased flood risk.

565: The Aberdeen Western Peripheral Route has reduced traffic in the city. Notes there are alternative routes into and around the City.

565, 599, 694, 735, 767, 927: Concern over Loss of green space.

735, 927: Concerns about Compulsory Purchase Order.

735: Concerns around pedestrian safety.

599: Concern over impact on house insurance and potential damage to property from works. Factor fees have been paid to a piece of land no longer within the existing development ownership. Key findings from CHI.19.020 South College Street show there is no solution that provides additional benefits for all road users.

694, 767, 927: Concern over impact on property prices and security.

767: Concern over loss of residential privacy. Respondent was not notified of these works when purchasing the property. Concerns over safe access to communal bins.

927: Concern over increased vibration to building.

1153: There is no indication of how close the development is to existing flats. This presents a danger to residents due to the proximity of entrances to flats.

Berryden Corridor Improvements Objections

117: Respondent does not support project due to loss of limited green space in Kittybrewster area. The scheme will result in additional air pollution and loss of habitat.

166, 167, 176: Objects to project.

166, 167: The development is unnecessary due to opening of Aberdeen Western Peripheral Route which has reduced traffic. Caroline Place does not have enough space for a dual carriageway.

166: Work patterns have changed and there are less commuters. Respondent demands traffic re-count of the actual traffic using the Berryden Corridor.

167: Development will result in traffic closer to house and dust. Concerned about lack of parking in front of house.

167, 266: Noise concerns.

266: Concern over impact on property values. Queries an update on the compulsory purchase order for land surrounding the property.

1190: Comments submitted on the detail of the development, relating to boundary detailing, pedestrian infrastructure and safety, access, and flooding.

Policy T2 - Sustainable Transport

717: The respondent recognises the need for development to be sustainable, however contributions must be fairly and reasonably related to the proposed development in terms of the Circular 3/2012 tests. Aberdeen City will have assessed proposed developments access to public transport. Claims not possible to comment on policy because Aberdeen Planning Guidance is not available. Requests publication of document before the examination so further comment can be made.

880: Supports the policy.

1173: The Proposed Local Development Plan makes reference to improving walking and cycling links in each zone however there are no substantive changes that will encourage increased travel. Every development will increase traffic, pollution and congestion.

Policy T3 – Parking

General

629: New housing development should be required to segregate cycle lanes next to roads. Developers should build more secure bike locking stands for both residential and commercial uses. Lack of sufficient cycle parking discourages people from cycling.

717: Not possible to comment on policy because Aberdeen Planning Guidance is not available. Requests publication of document before the Examination so further comment can be made.

839: Parking restrictions within the City Centre push traffic onto small side streets. Queries why both a 4-bedroom home and a 1-bedroom flat are both only allocated one private parking permit.

891: Policy is overly restrictive and represents a significant step-change in policy from that of the extant Local Development Plan 2017. Acknowledges the commitment to move towards a City which is less reliant on the private car, however the Policy could have serious repercussions for the development industry.

Policy should contain provision for car parking where it can be appropriately justified, particularly in the Inner City zone. Notes car ownership levels in the City remain high. A sudden shift to low/zero parking within the Inner City zone could lead to pressures on on-street parking and which can impact on road safety. Suggests a phased approach allowing the implementation of restrictions to be considered as part of an interim review of the Local Development Plan. Zero parking policy will curtail the number of electric charge points coming forward in new development within the City Centre and Inner City areas.

The Proposed Local Development Plan should encourage the shift to alternative fuel vehicles, in line with wider Scottish Government Targets such as 'Switched On Scotland'.

Residents in new developments in the Outer City will continue to expect appropriate parking for their vehicles. Policy does not note what parking ratios will be. Guidance should be available to comment as part of this consultation.

897: The Policy is vaguely worded. It defers details such as car parking, electric vehicle charging, provision of cycle infrastructure and parking standards to Aberdeen Planning Guidance. These impact on design, density and viability of future development and should be addressed in the Proposed Local Development Plan to allow for a response.

Electric Vehicle Charging

193: Welcomes requirement for electrical vehicle infrastructure however notes the Policy should be more ambitious. Supports position of an operational chargepoint on new build properties. Encourages adoption of electric car club vehicles with private or shared on-street active provision for social/affordable housing. Recommends higher proportion of actively and passively prepared bays for non-residential developments. Recommends synergies with overnight use be encouraged, to reduce need for overall parking and increase charging use and revenue. Respondent would support Aberdeen Planning Guidance including text permitting load-balanced infrastructure. Where such units are provided the respondent recommends that policy offers a preference be given for a minimum of two units installed. Respondent encourages the Council to include a section on accessible vehicle charging infrastructure in the Aberdeen Planning Guidance. Respondent suggests specific guidance they produce. Supports promotion of public transport and active travel.

707: Provision of Electric Vehicle Hubs could accelerate Aberdeen's decarbonization prior to 2050. Existing charge points are often not clearly marked. Council's decision to introduce fees at chargepoints is unfair. Notes there is currently no provision for electric bikes. These would provide clean air with low investment.

768: Supports encouragement of electric charging stations. Requests wider engagement with Scottish Hydro Electric in regard to the capacity of the electricity grid.

843: Support section on Alternative Fuel Vehicle Infrastructure. Suggests existing car parking at the Beach/Esplanade be considered for electric vehicle charging points. Location has community support, and this would contribute to supporting the beach as a leisure destination while reducing emissions.

891, 897: Broadly supports aspiration to include more electric vehicle charging. Recommends a joined up approach is taken. Requirement of blanket provision in all developments may exacerbate network capacity issues and will require significant network upgrades. Building Standards is considering requirements for Electric Vehicle charging as part of the 2021 Review. Planning Policy should not duplicate or pre-empt future Building Standards requirements. (891) Planning must be cognisant of grid capacity issues to ensure policies are achievable.

897: Ratios are not an appropriate way of setting requirements for Electric Vehicle charging. Respondent considers there are other avenues to determine requirements and refers to Building Standards. Planning policy should not focus on one technology. This may result in unreasonable costs to install technology which may be redundant in the future. Respondent has encountered problems relating to current policies on Electric Vehicles and transport policies. Difficult to interpret the Policy without accompanying

Aberdeen Planning Guidance documents. Requests engagement with the Council and better co-ordination.

900: Queries the grid system's capacity to deal with extra pressures from additional charging requirements. This is an emerging technology and infrastructure is not yet in place to enable the full roll out of electric charging at homes and businesses. Queries whether all homes will need charging points. Considers until grid capacity offers certainty such requirements will be unaffordable or unfeasible. Suggests ratios and requirements are set out in non-statutory guidance.

959: Supports policy and requirements for underlying charging infrastructure for residential units. Conditionally supports requirement for active provision for non-residential uses in line with the table based on whether charging points can serve a range of different units within close proximity.

Modifications sought by those submitting representations:

Policy T1 - Land for Transport

General

887: Modify Policy to include a bullet point: "*Aberdeen South Harbour and its future expansion including the Energy Transition Zone and associated infrastructure*". Amend Proposals Map to include Scottish Transport Appraisal Guidance (STAG) options to protect the land from other development which may prevent its delivery.

900: Modify Policy to provide greater clarity on the implications for development, when contributions will be sought, and the level of contribution required.

910: Add the following text: "*Aberdeen South Harbour and its future expansion including the Energy Transition Zone and associated infrastructure.*"

Aberdeen Western Peripheral Route

570: South access and exit to the Aberdeen Western Peripheral Route at the junction on C89C (Fairley Road) should be put in place at the earliest opportunity.

South College Street Improvements Objections

126, 1153: Do not proceed with development.

Berryden Corridor Improvement

117: Remove the scheme from the Proposed Local Development Plan.

166, 167: Serve a Compulsory Purchase Order (CPO) on all the remaining properties on Caroline Place, 4, 4A and 5.

Policy T2 - Sustainable Transport

717: Aberdeen Planning Guidance must be provided in advance of the Examination. Reference the test set out in Circular 3/2012 for any contributions.

1173: The measure listed for each zone to encourage active travel should be reassessed. More stringent conditions should be put to developers to implement active travel measures before planning permissions are granted.

Policy T3 - Parking

General

629: New housing development should be required to include segregated cycle lanes next to roads. Developers should build more secure bike locking stands.

717: Aberdeen Planning Guidance must be provided in advance of the Examination.

891: Modify policy to provide greater flexibility – in particular to provide off-street parking within new housing developments, particularly within Inner and Outer City. These ratios should be clearly outlined within supporting guidance.

Electric Vehicle Charging

193: Amend policy as follows: 1) Both active and passive provision of Electric Vehicle charging across the spectrum to be increased (significantly above 10%). 2) Policy support for non-residential car park charge provision to have preferential support if the infrastructure can be made available to support nearby residents who cannot have home charging. 3) Support in policy for load-balanced charging infrastructure as a sustainable approach to minimise network reinforcement. 4) Guidance on the layout of charging infrastructure including long vehicle bays. 5) Enhanced cycle parking provision in the Guidance.

707: More Electric Vehicle charging hubs. Electric bike rental schemes. Clearly marked bays for Electric Vehicles.

897: Amend the text under the heading 'Alternative Fuel Vehicle Infrastructure' to read: "*Details of requirements for electrical vehicle charging are set out in Aberdeen Planning Guidance: Transport and Accessibility.*"

900: Ratios for electric vehicle charging should be identified within Policy T3 to allow for assessment of the feasibility to deliver this policy. Technical constraints outwith control of developers should not compromise the delivery of the housing targets and development strategy.

959: Policy or supporting guidance should clarify that for Masterplan developments, a holistic view on electric vehicle charging can be taken provided it is in line with page 3 of the guidance. Active provision for residential uses can be shared between a range of such uses in close proximity where appropriate and compliant with the standard, for example, for a cluster of non-residential units with 50-399 parking spaces, active provision for 2 spaces would suffice.

Summary of responses (including reasons) by planning authority:

Policy T1 – Land for Transport

General

Paragraph 275 of Scottish Planning Policy 2020 (CD XX) states: *“Development plans should identify any required new transport infrastructure or public transport services, including cycle and pedestrian routes, trunk road and rail infrastructure. The deliverability of this infrastructure, and by whom it will be delivered, should be key considerations in identifying the preferred and alternative land use strategies”*. Proposed Policy T1 – Land for Transport sets out a number of transport projects and safeguards land for their delivery and indicates this on the Proposed Local Development Plan’s City Wide Proposals Map.

Overall transport policy is dealt with in the Regional Transport Strategy 2020 (CD XX) and the Local Transport Strategy 2016-2021 (CD XX). Local Transport Strategy objectives are reflected in the Proposed Local Development Plan, and an important part of this is investment in road infrastructure such as the Berryden Corridor and South College Street Improvements.

Aberdeen Western Peripheral Route

245: The delivery of the Aberdeen Western Peripheral Route was not the responsibility of Aberdeen City Council.

570: With regard the allocations of OP21 Rowett South and OP22 Greenferns Landward both allocations were considered in the Cumulative Transport Appraisal 2018 (CDXX) which supported the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). The Summary of Transport Intervention Options of the Aberdeen City and Shire Strategic Development Plan 2020 has been transposed into the Proposed Local Development Plan at page 93. Reference to the Kingswells junction is made in this Table and there will be ongoing monitoring of the Aberdeen Western Peripheral Route to determine its functionality. Any future access to the Strategic Network would come through detailed monitoring and a well evidenced justification for its need supported by Transport Scotland.

Aberdeen Harbour South

790: Support for the provisions of the Proposed Policy is noted. The Council has set out projects that will be delivered by itself or regional partners which are demonstrated to be required and which are also committed to in either the Local Transport Strategy or the Regional Transport Strategy. While there may be merit in safeguarding land for future railway improvements, other than those already referred to in the Proposed Policy, until the need for these projects are demonstrated it would not be appropriate for them to be included on the City Wide Proposals Map. The Council welcomes the respondent’s interest in working collaboratively on level crossing safety we are unaware of any level crossings located in Aberdeen City.

887, 910: The Aberdeen City Region Deal contains a commitment to improving the external transport links to Aberdeen South Harbour. At the time of consultation on the Proposed Local Development Plan the work required to assess preferred options for transport links was ongoing. A Scottish Transport Assessment Guidance (STAG) option appraisal process has recently been completed, and a preferred option approved by the Council’s City Growth and Resources Committee (03/02/21). The preferred option A4 involves an upgrade of the existing coast road, replacing the existing rail crossing and accessing Wellington Road via Hareness Road.

The next substantive stage of work will be the design process, but prior to that a Strategic Updated Business Case (SUBC) is required, which will be the document used to access subsequent City Region Deal funding, and provide project assurance, to the City Region Deal Board, Scottish Government and United Kingdom Government regarding the arrangements for the design process. The SUBC will therefore focus both on the case for the investment and preferred option, but importantly, provide a forward plan for the execution of the design process. As such there is still substantial work to be undertaken before a definitive route can be determined.

South College Street Improvements

110, 126, 565, 599, 735, 767: The South College Street Improvement has been included in Proposed Policy T1 – Land for Transport in both the Local Development Plan 2012 (CD XX) and the extant Local Development Plan 2017 (CD XX). As such the principle of this project has been well established and is carried forward to the Proposed Local Development Plan.

Improvements to South College Street were an integral part of the Central Aberdeen Transport Infrastructure programme determined in 2004 alongside the Union Street Pedestrianisation study. A scheme approved in 2007 was designed to provide relief to a heavily congested part of the network that would be significantly impacted by pedestrianisation. Improvements on South College Street were designed and progressed to tender stage with construction planned for 2009/10, however this was postponed, at the time, as a result of a review and reduction of the General Fund Capital programme.

On 24 June 2015, the Council unanimously agreed to adopt the Aberdeen City Centre Masterplan and Delivery Programme. Agreeing in principle the interventions set out and further resolving that each project would be subject to detailed scrutiny and the normal development control processes.

The City Centre Masterplan (CD XX) identified Station Gateway (IA5) as one of 7 areas *“that are less well utilised or failing to deliver the quality and scale of activity that is expected in a thriving and successful city centre”*. The Masterplan’s focus on the intervention area is *“The critical remodelling of the key gateway to the city centre, with new business and commercial developments, providing city centre users and visitors with a radically transformed arrival experience, leading seamlessly northwards to Union Street.”*

The Station Gateway has two objectives which require significant changes to the city centre road network:

- *“Removal of cars on Guild Street and sections of Carmelite Street and Wapping Street, creating the opportunity to expand pedestrian footways and Union Square as a pedestrian friendly space and form a seamless pedestrian route through the Merchant Quarter.*
- *A high quality public realm scheme on Guild Street with high quality materials and simple unfussy designs that creates comfortable places for people to linger and enjoy.”*

Following the adoption of the City Centre Masterplan and Delivery Programme (CDXX) the impact of the proposed changes on the City’s road network was assessed. This work identified the South College Street Junction Improvements project as an enabling

measure, highlighting that its associated capacity improvements would be essential prior to implementation of the east-west routes interventions namely Guild Street (EN02) and Union Street (EN05). Further work has confirmed that the previously approved project (Option 1) should be developed as a first phase solution. This outcome was presented to Communities, Housing and Infrastructure Committee on 8 November 2017 and the committee instructed that Option 1 should be progressed as the preferred option.

On 6 June 2019, the City Growth and Resources Committee adopted a new North East Scotland Roads Hierarchy (CDXX), fundamentally changing the way access to and around the city will be promoted and controlled. South College Street will have a more important role to play in the new arrangements providing a key route to the City Centre. To acknowledge this role the new hierarchy identifies South College Street as a Secondary Radial Route which is to be re-designated as a B class road from its current C class status. The improved junction capacity and operation provided by the project supports this new status.

Delivery

The Business Case for the South College Street project was approved by the City Growth and Resources committee on 26th September 2019 and since then Officers have revisited the original design and made changes in line with current guidelines and standards. The design is almost finalised and currently indicative programming anticipates works to construct the improvements starting late Summer 2021 with full opening planned for Summer 2022.

110, 126, 565, 599, 694 735, 767, 1153: It is asserted that there will be increased air pollution as a result of the project. The project is located close to the Virginia Street/Trinity Quay/Guild Street Air Quality Management Areas and as such there is regular monitoring undertaken by the Council of air quality. The Council is also in the process of developing a Low Emissions Zone for the City Centre which aims to reduce emissions from vehicular movements. The Low Emissions Zone will include Bridge Street which is to the immediate north of South College Street.

126, 565, 599, 694, 735, 1153: Three of the main objectives of the intervention are; Improving journey times and connections; Reducing congestion and enable the rerouting traffic away from the city centre core. The Council is working with NESTRANS on an updated version of the Aberdeen Sub Area Model post Aberdeen Western Peripheral Route opening. This should offer a better understanding of whether the delivery of this project, the Roads Hierarchy and the option offered by the Aberdeen Western Peripheral Route to allow traffic to bypass the City Centre is reducing traffic. Additionally, the project offers improved active travel options which should complement the Regional Transport Strategy's aims to increase active travel and reduce car usage.

126: An Equality and Diversity Assessment was undertaken in support of the Proposed Local Development Plan (CDXX). This did not indicate there would be negative impacts on protected characteristics as a result of the contents of the Proposed Local Development Plan.

565, 735, 767: The project has been designed to take drainage issues into consideration.

565: A benefit of the project is to enable the rerouting traffic away from the City Centre core. This will work in tandem with the benefit of the recently operational Aberdeen Western Peripheral Route.

565, 599, 694, 735, 767, 927: The details of green space lost are addressed under the details of the actual scheme to be delivered and not in the Proposed Local Development Plan. While some green space is lost it is the intention of the project to improve the quality of green space as part of works.

735, 927: The Compulsory Purchase Order process for the land assembly to deliver this project is a separate process to the examination of a Proposed Local Development Plan.

735: One of the stated aims of this project is improved pedestrian links. For walking and cycling the project will result in: creating additional signalised crossing points, providing segregated and continuous cycling facilities, improving the accessibility to the City Centre, railway, and bus stations.

599: The impact on housing insurance is beyond the scope of a Local Development Plan and cannot be considered as part of its Examination. Potential property damage to property as a result of works is an unsubstantiated assertion however the delivery of the project will require a Construction Management Plan which should address such concerns. Factor fees are beyond the scope of a Local Development Plan and cannot be considered as part of its Examination. In terms of the scheme not providing additional benefits for all road users, a detailed appraisal of the required improvements has been undertaken and a preferred option was adopted by the Council in 2017. As the design has progressed further work, including traffic modelling, has been carried out to ensure that the Project will perform effectively.

694, 767, 927: Impact on property prices and security is beyond the scope of a Local Development Plan and cannot be considered as part of its Examination.

767: The design of the project has gone through multiple assessments to ensure that it will result in improvements to the built environment and therefore loss of privacy would be minimised. There have been multiple previous notifications of the project and these may have occurred when the respondent was not living in the area and was therefore unaware. It is not the Council's responsibility to inform a potential property buyer of the transport interventions planned near that property, that is the responsibility of the buyer or their representative.

927: There may be increased vibration through the construction process but this should be temporary in nature. A Construction Management Plan should take such issues into consideration.

1153: The detail of the proposal was made available through an online public exhibition from 9th December 2020 to the 19th January 2021. Details are still available on the Council's website (CDXX or hyperlink).

Berryden Corridor Improvements Objections

The Berryden Corridor Improvement project is a key element in the Council's long-term strategy to reduce traffic within the City Centre. Alongside other roads projects such as at South College Street, it would allow traffic to be routed around the City Centre core, rather

than through it, which in turn would allow space within the City Centre to be reallocated to use by pedestrians and sustainable transport modes. The project would also alleviate congestion along the route and also at the Westburn Road / Hutcheon Street / Berryden Road junction, which is key to the success of the re-routing of traffic from the City Centre. The project would support the aims of the Regional Transport Strategy (CD XX) and themes contained within the National Transport Strategy (CD XX) and Scottish Planning Policy (CD XX).

By virtue of being included within the Council's Local Transport Strategy (CDXX) the principle of the project is established. Alongside the inclusion in the Local Transport Strategy, the land was allocated in both the Local Development Plan 2012 (CD XX) and the extant Local Development Plan 2017 (CD XX), further establishing support for the proposal. Support is also offered from the City Centre Masterplan (CDXX) and Strategic Infrastructure Plan (CDXX).

117: The proposal is located in an urban area and in essence is the upgrading of an existing road. As such green space and habitat is at a minimum. In support of the Planning Application 200366/DPP the Council undertook a Preliminary Ecological Appraisal along the length of the route. Its conclusions were that the biodiversity value of the study area is low, due to its urban nature, the absence of semi-natural habitats (many of the tree species present are noted to be of introduced varieties) and the overall scarcity of green networks and other connectivity to sites of nature conservation value in the wider area.

166, 167, 176: Objections to the project are noted, and the principle of the project has been established above.

166, 167: Committed infrastructure and developments, including the Aberdeen Western Peripheral Route, have been included in traffic modelling undertaken to assess the impact of predicted future traffic levels upon the Berryden Corridor and the surrounding road network. These assessments indicated that there is a requirement for the Project due to the levels of travel demand. No individual transport intervention can solve the transport network's issues or limitations which is why a suite of integrated interventions are required to improve the overall network, as reflected in the Local Transport Strategy (CDXX). The interventions work in tandem and not independently to meet the Strategy aims and objectives.

166: The COVID-19 pandemic has had a dramatic impact on travel across all modes, specifically travel in Scotland's City Centres. There is uncertainty over what travel will look like after the pandemic has ended, however, evidence to date has shown that traffic demand in Aberdeen has shrunk significantly during periods of lockdown but recovered quickly when the restrictions ease. Additionally, committed infrastructure changes within the City Centre area (City Centre Masterplan) which Berryden Corridor Improvement supports may be delivered more quickly in light of the experience of physical distancing measures. Furthermore, the project aims to improve pedestrian and cycle infrastructure; both walking and cycling activity has significantly increased across the City since the beginning of the first national lockdown in March 2020.

167: The specific route of the final design is set out and has been addressed through the planning application, 200366/DPP, for the Berryden Corridor Improvement. The Proposed Local Development Plan Policy T1 – Land for Transport considers the principle of such a scheme and enables its delivery through protecting land which may be needed for its delivery.

167, 266: A noise and vibration assessment (CD XX) was undertaken to support the design work for the project and this considered mitigation measures for the final design.

266: Impact on property prices and security is beyond the scope of a Local Development Plan and cannot be considered as part of its Examination.

1190: It is assumed that comments relate to the planning application, 200366/DPP, for the Berryden Corridor Improvement which was neighbour notified during the consultation period of the Proposed Local Development Plan.

Transport Intervention Options

885: Paragraph 11.25 page 93 of the Proposed Local Development Plan sets out a Summary of Transport Intervention Options. These options have resulted from the Cumulative Transport Appraisal 2018 (CD XX), which supported the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) and are also set out in the Aberdeen City and Shire Strategic Development Plan 2020's Schedule 1, page 49. The Cumulative Transport Appraisal 2018 (CD XX) included a number of interventions, considered in a regional context, which could aid the mitigation of increased transport movements resulting from the potential level of future development in the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX). The Table of Interventions was included in the Proposed Local Development Plan 2020 on page XXX after discussions with Transport Scotland on a draft version of the Proposed Local Development Plan.

It is understood that the respondent's concerns relate to previously allocated and approved developments such as Grandhome, Woodside, Craibstone, Rowett South, Aberdeen Exhibition and Conference Centre, Countesswells and Loirston. The allocation of and subsequent planning permission for these sites resulted from housing allowances set out in the Aberdeen City and Shire Structure Plan 2009 (CD XX) and the Aberdeen City and Shire Strategic Development Plan 2014 (CD XX). The potential transport impact of these strategic allocations was considered by the Cumulative Transport Assessment 2010 (CD XX). These allocations were included in the Local Development Plan 2012, the extant Local Development Plan 2017 and the Proposed Local Development Plan.

Therefore, the Proposed Local Development Plan continues the Spatial Strategy of the Aberdeen City's last two Local Development Plans. Many of the allocations have obtained planning permission and development is being delivered. The transportation interventions of the Cumulative Transport Appraisal 2010 (CD XX) were incorporated into the Aberdeen City and Shire Strategic Development Plan 2014 (CD XX) in order to accommodate the levels of growth proposed in that Plan. The funding to deliver these interventions was, in part, to be met by the Aberdeen City and Shire Strategic Development Plan 2014's Supplementary Guidance on the Strategic Transportation Fund (CD XX), now quashed.

With the Strategic Transport Fund Supplementary Guidance (CD XX) quashed, no further contributions to the Strategic Transport Fund can be sought nor can they be claimed retroactively from previously approved developments. In the absence of a Strategic Transport Fund both Aberdeen City and Aberdeenshire Councils have required developers to undertake their own Transport Assessments, to demonstrate that they can mitigate any strategic and local transport issues cause by their developments. This approach has allowed planning applications to be determined in the absence of the

Supplementary Guidance for the wider economic benefit of the area on the basis of the consistent application of national guidance on transport assessments.

Scottish Government Circular 3/2012: Planning Obligations and Good Neighbour Agreements (CD XX) provides guidance on the issue of planning obligations in Scotland. Before any similar alternative options can be considered for a future strategic transport funding mechanism, clarity is required with regard the Planning (Scotland) Act 2019 (CD XX) and how Scottish Ministers intend to take Part 5 Infrastructure Levy of the Act. Should this be taken forward, there may be a requirement to produce a new Circular relating to Planning Obligations.

While the above has considered the respondent's concerns relating to historical allocations and the transport interventions considered to mitigate their impacts, we must also be mindful that nationally, regionally and locally there is a drive towards the reduction in use of the private car and the sweating of existing infrastructure. This policy shift is ambitious and needs to be rapid and therefore mitigation interventions considered appropriate in the Cumulative Transport Appraisals 2010 and 2018 (CD XX and CD XX) may not align with these policy objectives. It should also be noted that both Cumulative Transport Appraisals were informed by previous version of the Aberdeen Sub Area Model (ASAM) which were developed before the completion and operation of the Aberdeen Western Peripheral Route.

The National Transport Strategy 2020 (CDXX), the Scottish Government's Climate Change Plan (CD XX), the Aberdeen City and Shire Strategic Development Plan 2020 (CD XX), the Regional Transport Strategy (CD XX) and the Proposed Local Development Plan all refer to the need to reduce the number of journeys by private car.

In May 2019, the Scottish Government declared a global climate emergency. Nationally there is a commitment for net zero carbon emissions by 2045 with interim targets for reduction of at least 56% by 2020, 75% by 2030 and 90% by 2040. At the end of 2020, the Scottish Government also published an update to its Climate Change Plan which commits to reducing car kilometres by 20% by 2030.

The National Transport Strategy 2020's (CD XX) interconnected priorities enable the delivery of its Vision and take action on Climate Change and improved health and wellbeing. The Strategy references the ambitions in the Climate Change (Scotland) Act 2009 (as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019) to reduce emissions and that transport is the largest national contributor to these emissions. The strategy states that "*We will design our transport system so that walking, cycling and public and shared transport take precedence ahead of private car use*". The Strategy also has ambitions to improve health and wellbeing which places active travel modes ahead of the private car with the added impact of reducing respiratory and cardiovascular diseases. In this context the interventions relating to historic allocations relate primarily to road-based interventions in response to increasing vehicular movements which would seem incongruous with the National Transport Strategy's long-term ambitions. The strategy also highlights sustainable travel and investment hierarchies which place the private car and also investment in the network towards the bottom of these hierarchies. Greater focus is to be placed on the need for behavioural change and places the and the need to manage transport assets effectively while investing efficiently in the resources needed to maintain and safely operate them and to make better use of existing capacity.

The Infrastructure Commission for Scotland was established by the Scottish Government to provide independent advice on the nation's Vision, ambition and priorities to create a 30-year infrastructure strategy. In January 2020 it published its first key findings report. One of the recommendations, most relevant in terms of transport interventions is the statement that *"most of the underlying infrastructure that will be used in 30-years' time already exists today. It is therefore essential that these assets are most effectively and efficiently utilised, maintained and enhanced to net zero carbon readiness"*. In July 2020 the Delivery Findings report was published which focussed on prioritising an inclusive net zero carbon economy and enabling sustainable places.

A similar Vision and ambition inform the pillars of NESTRANS Regional Transport Strategy 2040 (CD XX). Relevant to this representation is the Pillar - Reducing Our Impacts on Climate Change and Protecting the Natural Environment. In order to achieve this one of the Regional Transport Strategy's key priorities is a step change in public transport and active travel enabling a 50:50 mode split between car driver and sustainable modes. This priority links to all four pillars of the Regional Transport Strategy. Achieving a mode shift away from private car driver towards more sustainable modes (defined as walking, cycling, wheeling, public transport and shared transport), as well as reducing the need to travel in the first place, is a central part of the strategy that will contribute to all four pillars as well as wider Scottish Government targets. As well as reducing congestion and the resulting economic benefits of this, a shift to more active modes of walking, cycling and wheeling and public transport will have significant benefits for health and well-being as well as the environment in terms of reduced emissions. Improvements to encourage more people onto bus and rail will help commercial operators and the public sector to further invest in improvements to services therefore enhancing provision and helping to remove barriers to accessing employment, health, education and leisure opportunities.

While the above clearly indicates a policy shift to more sustainable methods of travel, the Regional Transport Strategy (RTS) 2040 (CD XX) maintains a mechanism to consider and review the transport interventions of previous Cumulative Transport Appraisals (CTA). Paragraph 11.135 of the Regional Transport Strategy 2040 (CD XX) in reference to the Schedule 1 interventions states that *"Monitoring and further appraisals will be required of the network to understand if the transport interventions of the CTAs remain the right solutions in light of the wider outcomes and actions of the RTS"*. This is then connected to the delivery of the Regional Transport Strategy through Action RD11 (Page 69) which states that *"Nestrans will work with the Councils and Scottish Government to monitor, review and seek an appropriate funding mechanism to mitigate the cumulative impacts of development on the transport network where deemed necessary"*.

The Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) paragraph 8.7 states that the interventions listed in Schedule 1 shall continue to be reviewed, appropriately appraised, developed and programmed in association with the Regional Transport Strategy, the Local Development Plans, and other delivery mechanisms. Page 45 of Aberdeen City and Shire Strategic Development Plan 2020 (CD XX) also sets a target to reduce the percentage of journeys made by car.

The Proposed Local Development Plan paragraphs 11.25-11.28 set out the need for ongoing monitoring and review of the Transport Interventions to ensure they are both required and fit for purpose. It should also be noted that the interventions are the result of the Cumulative Transport Appraisal responding to the impact of new development if fully delivered. Given the paradigm shift away from private car journeys, the large numbers of employees working remotely, facilitated by the delivery of the City Fibre programme, and

further encouraged by the aims both nationally and regionally in terms of modal shift it will require further study to determine if the Transport Interventions are adequate and required.

The Council is committed to the ongoing monitoring of transport networks and the future study and review of potential transport interventions. Aberdeen City Council is part of the Aberdeen City Region Deal. The City Region Deal has allocated funds which are split between a variety of projects, one of which is a Strategic Transport Appraisal – Preliminary Options Appraisal Report (CD XX) to take a 20-year strategic view of the transport implications of the investment unlocked by the Aberdeen City Region Deal across all modes of transport. The City Region Deal Transport Working Group, to which the respondent is a member, also comprises Aberdeen City Council and NESTRANS. The Working Group is currently, amongst other projects, engaged in the development of a new Aberdeen Sub Area Model (ASAM) which will be informed by data from an operational Aberdeen Western Peripheral Route. Such a model will now be informed by data from delivered infrastructure and how future development could interact with the strategic network.

Paragraphs 7.13 of the Strategic Transport Appraisal – Preliminary Options Appraisal Report (CD XX) set out areas of the strategic trunk road network which may require upgrading. These routes would somewhat align with the concerns of the respondent. There is capacity within the Strategic Transport Appraisal – Preliminary Options Appraisal Report (CD XX) and its stakeholders to undertake further studies, informed by the upgraded ASAM, which can consider if the Transport Interventions listed in the Proposed Local Development Plan and the Cumulative Transport Appraisal are appropriate mitigation measure for future development. As previously stated, such commitment for further studies is made in the Aberdeen City and Shire Aberdeen City and Shire Strategic Development Plan 2020, the Regional Transport Strategy and the Proposed Local Development Plan. The studies are also specifically stated in the Proposed Local Development Plan's Delivery Programme (CD XX) under Strategic Development Plan transport interventions.

Policy T2 - Sustainable Transport

880: Support is noted and welcomed.

717: Proposed Policy T2 is clear that any required contribution will relate to the proposed development, and it would be proportionate to its scale and anticipated impact. This accords with Circular 03/2012 (CDXX). Matters raised in relation to referencing Circular 3/2012 within the policy are dealt with under Issue 34: Developer Obligations. It is agreed that the Development Options Assessment Report assesses proposed developments based on a sustainability checklist which includes accessibility as part of the criteria. Nevertheless, details of specific proposals are still subject to the planning application process.

It is the Council's intention to take forward the Transport and Accessibility Supplementary Guidance as non-statutory 'Aberdeen Planning Guidance'. The process for producing and adopting this will be similar to that currently used for Supplementary Guidance, with the exception that it will not be sent to Scottish Ministers prior to approval.

The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in Aberdeen Planning Guidance, which will

replace Supplementary Guidance. However, the Proposed Local Development Plan provides details of some of the issues which will be covered by Aberdeen Planning Guidance underneath the corresponding policy. Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no focus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that stakeholders will be able to comment at the appropriate level of policy detail at the appropriate time.

1173: The Proposed Local Development Plan fully supports sustainable infrastructure such as walking and cycling not only for new, but also for existing developments. Infrastructure requirements for all Masterplan Zones in relation to public transport, walking and cycling are set out in Section 40 of the Proposed Local Development Plan. The Table also sets out which parties are responsible for delivery. These are further expanded upon in the Proposed Local Development Plan Delivery Programme (CDXX). Proposed Policy T2 clearly sets out the expectation that new developments are required to be accessible by a range of transport modes with emphasis being placed on active and sustainable transport. This aligns with paragraph 273 of Scottish Planning Policy 2020 (CDXX), which encourages local development plans to promote travel according to the following hierarchy: walking, cycling, public transport and cars. In addition, Proposed Policy T3 Parking highlights the Council's commitment to active travel through the principle of 'zero parking' for all new development within the City Centre and the requirement for cycle parking. In relation to planning permissions, each proposal will be subject to the planning application process and as per paragraph 11.29, detailed assessments will be required as appropriate to determine the impact of development and the most appropriate travel measures and developer contributions required to support the development.

Policy T3 – Parking

General

629: The Proposed Local Development Plan recognises that high quality facilities that enable and encourage people to cycle are an important feature of the City's sustainable transport infrastructure. While it is agreed that lack of cycle parking discourages people from cycling, Proposed Policy T3 sets out the expectation for developments to include covered and secure cycle parking. This is in alignment with the aspirations of the Aberdeen City and Shire Aberdeen City and Shire Strategic Development Plan 2020 (CDXX), the NESTRANS Regional Transport Strategy 2040 (CDXX) and the Local Transport Strategy 2016-2021 (CDXX). Each individual proposal will be subject to the planning application process and in accordance with Proposed Policy T2 will also be expected to prioritise walking, wheeling, cycling and public transport in that order. Furthermore, Aberdeen Planning Guidance: Transport and Accessibility will include specific standards on cycling parking for various types of development including both residential and commercial.

The Council also appreciates that it has a 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 cyclists. The Aberdeen Active Travel Action Plan 2021-2026 (CDXX) identifies actions and interventions the Council will pursue to make walking and cycling safer and more attractive choices for the public, and to increase the number of active journeys in the City.

717, 897, 891: It is the Council's intention to take forward the Transport and Accessibility Supplementary Guidance (CDXX) as non-statutory 'Aberdeen Planning Guidance'. The process for producing and adopting this will be similar as is currently used for Supplementary Guidance, with the exception that it will not be sent to Scottish Ministers prior to approval.

The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in Aberdeen Planning Guidance, which will replace Supplementary Guidance. However, the Proposed Local Development Plan provides details of some of the issues which will be covered by Aberdeen Planning Guidance underneath the corresponding policy. Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no focus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public. This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that stakeholders will be able to comment at the appropriate level of policy detail at the appropriate time.

839: Respondent's queries on parking permits standards for different residential units are noted. Parking permits are a separate issue and not within the remit of the Local Development Plan.

839, 891: The Proposed Local Development Plan, and indeed all the Proposed Transport Policies, embed sustainable travel hierarchy principles by promoting walking, wheeling, cycling, public transport and shared transport options in preference to single occupancy private car use for the movement of people. This accords with the National Transport Strategy 2 (CDXX), NESTRANS Regional Transport Strategy 2040 (CDXX) and the Local Transport Strategy 2016-2021 (CDXX). Proposed Policy T3 also aligns with paragraph 273 of Scottish Planning Policy 2020 (CDXX) which encourages local development plans to promote opportunities for travel according to the sustainable hierarchy principles. The policy makes clear that zero parking will only be applied in the City Centre, and low or no car developments will be supported in Inner and Outer City locations where this is suitable. It also states that where this is not possible, developments will be expected to comply with parking standards to be set out in Aberdeen Planning Guidance: Transport and Accessibility.

The NESTRANS Regional Transport Strategy 2040 (CDXX) and the Local Transport Strategy (CDXX) support the enforcement of parking restrictions, particularly where these exist to support strategic traffic movements, pedestrian/cycle and bus priority and road safety. While it is agreed that car ownership in Aberdeen is high, continuing to provide high levels of car parking in the City Centre will encourage private vehicle use and will therefore undermine the Council's aspirations to promote sustainable modes of transport. The City Centre is one of three Air Quality Management Areas (AQMAs) in Aberdeen, where the volume of nitrogen dioxide, 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 City Centre Masterplan and Delivery Programme 2015 (CDXX) which promotes the improvement of sustainable transport and limiting the movement of private vehicles in the City Centre. This includes applying stricter 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. The principle of 'zero parking' in the City Centre also aligns with the Council's Sustainable Urban Mobility Plan 2019 (CDXX, page 8) whose Vision is to have *"a city centre that is accessible to all, which enables healthy and sustainable lifestyles by prioritising the needs of those walking, cycling, wheeling and using public transport and which contributes to wider aspirations to deliver a safe, sustainable and economically buoyant city centre with an enhanced sense of place."*

The Proposed Local Development Plan fully supports alternate fuel vehicles and Proposed Policy T3 includes the requirement for electric vehicle charging infrastructure for both residential and non-residential developments. Paragraph 11.27 of the Proposed Local Development Plan also highlights the Council's commitment to the development and trial of technological advances such as hydrogen fuel cell and battery electric vehicles. With just under a quarter of Scotland's emissions coming from transport, the use of battery electric and hydrogen in transport will help the transition to a low carbon economy. The Council is cognisant of the fact that battery electric vehicles and hydrogen fuel cell vehicles emit no harmful emissions from the exhaust and encouraging the shift to them from fossil fuelled vehicles can help to improve air quality and reduce air pollution and carbon, and as such is committed to pursuing these alternate fuel technologies when it comes to transport.

Electric Vehicle Charging

193, 768, 891, 897, 959: Support for Proposed Policy T3 is noted and welcomed.

193: The Council is supportive of Car Clubs. Co-Wheels have operated Aberdeen's car club since April 2012 and have 53 vehicles widely located throughout the City including battery electric and fuel cell hydrogen vehicles. Where Co-Wheels battery electric vehicles are located, these include active provision of an electric chargepoint. The Proposed Local Development Plan recognises that there will be instances where people will require to travel by car and Proposed Policy T2 – Sustainable Transport supports car sharing and Car Club measures for developments. Support for public transport and active travel have been noted and are welcomed. Proposed Policy T3 supports the provision Electric Vehicle infrastructure for non-residential uses. Whilst the Council is supportive of residents having access to Electric Vehicle infrastructure from nearby non-residential uses, it is the commercial occupier's prerogative on whether to allow this.

193, 897, 900, 959: It is the Council's intention to take forward the Transport and Accessibility Supplementary Guidance (CDXX) as non-statutory 'Aberdeen Planning Guidance'. The process for producing and adopting this will be similar to that currently used for Supplementary Guidance, with the exception that it will not be sent to Scottish Ministers prior to approval.

The level of detail in the Proposed Local Development Plan policies are appropriate. More detailed policy aspects will be contained in Aberdeen Planning Guidance, which will replace Supplementary Guidance. Proposed Policy T3 states the ratios and requirements for Electric Vehicle infrastructure, and car and cycle parking standards will be covered by Aberdeen Planning Guidance. Neither Aberdeen Planning Guidance or Supplementary Guidance is dealt with at Examination and Reporters have no focus on these matters. The final and detailed contents will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public. This will take place after the Examination when the final wording of the Local Development Plan policies will

be known. This means that stakeholders will be able to comment at the appropriate level of policy detail at the appropriate time.

Specific recommendations on the details of Electric Vehicle infrastructure such as load-balanced charging, synergies with overnight use and accessibility have been noted and are welcomed. Request for guidance to clarify that for masterplan developments, a holistic view on electric vehicle charging can be taken has been noted. These will be investigated and considered further when reviewing the current Transport and Accessibility Supplementary Guidance and developing the Aberdeen Planning Guidance.

707: Aberdeen City Council is supportive of Electric Vehicle Hubs and recognises that Electric Vehicle infrastructure at a larger scale will encourage the shift towards alternative fuel vehicles and help achieve Scottish Government's objective to decarbonise the road transport sector by 2050 (Low Carbon Scotland, 2013 (CDXX)). Proposed Policy T3 promotes the provision of appropriate Electric Vehicle infrastructure for new development and as such is aligned with Scotland's decarbonisation targets. Respondent's comments on unclearly marked charge points have been noted. The extant Transport and Accessibility Supplementary Guidance (CDXX), which will be reviewed and carried forward as Aberdeen Planning Guidance, encourages developers to clearly mark each parking space.

With regards to the introduction of fees at charge points, the Council has been offering the public charging service for free since 2013, and like many other authorities the Council can no longer afford to absorb the electrical cost of providing the charging service for free, especially as demand for charging infrastructure continues to grow. Therefore, at the Full Council Budget setting meeting in March 2020, the decision was taken to start charging for the use of the charge points (CDXX). When researching this, the Council considered both the costs that the charge point network operator, Chargeplace Scotland, charges hosts and the costs that the Council is charged by its energy provider for the electricity. Therefore, the initial 38p charge covers the transaction charge the Council is charged by the network operator and the 19p per kWh covers the energy cost, additional costs from the network operator and the general running costs of the charge points such as the power they consume when not charging a vehicle (screens and status lights are powered up all the time). The Council also looked at what other Local Authorities were charging users to use their charge points to ensure that our tariffs compared favourably. Evidence has shown that implementing a tariff leads to chargepoints being used more efficiently while also encouraging more private network operators into the market who would not be able to compete against a free model. This should therefore lead to a greater provision of charge points for users and will encourage a greater uptake of Electric Vehicles as time progresses.

It is agreed that electric bikes add to the overall package of sustainable transport. Aberdeen City Council has partnered with ShareBike, an established Norwegian bike hire company, and The Big Issue to bring an electric bike-hire scheme to the city. This will incorporate 450 e-bikes which will be installed at various locations throughout the city and is expected to be operational by Autumn 2021.

768: The Council notes and welcomes the request for wider engagement with Scottish Hydro Electric with regards to the capacity of the electricity grid. To date, there has been active engagement between Scottish Hydro Electric and Local Authorities to understand how future plans for electric vehicle infrastructure may impact upon the grid. It is the

Council's intention to continue this dialogue to enable further development of the electric supply infrastructure to support the shift to Electric Vehicles.

843: Support is noted and welcomed. Suggestions for Electric Vehicle charging infrastructure at the beach is welcomed. In February 2021, the Council approved The Aberdeen Electric Vehicle Framework 2020-2030 (CDXX) at its City Growth and Resources Committee. The Framework's aim is to encourage and actively cater for a greater uptake of EVs in the City. It also identifies how the city's charging infrastructure should be expanded and managed. Key potential locations for Electric Vehicle charging infrastructure that have been identified in the Framework, and its supporting Evidence Base and Baseline Report include Aberdeen beach.

891, 897, 900: Scottish Government's ambition is to phase out the need for new petrol and diesel cars and vans by 2030 (Climate Change Plan 2020 (CDXX)). This date has been brought forward from the previous target of 2032 and is likely to result in a larger and quicker shift to plug-in vehicles. 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. Evidence shows that around 80% of charging takes place at home so the requirement for residential developments to have electrical capacity built into them to support home charging is imperative. Requirement for such infrastructure provision in the Proposed Local Development Plan will help achieve Scottish Government's objective to decarbonise road transport by 2050 (Low Carbon Scotland, 2013 (CDXX)). There is also a huge role for non-residential developments, both to provide provision for those who cannot charge at home but also to provide destination and "en-route" charging options as part of journeys. Investment in charging infrastructure and supporting power supplies for non-residential developments, in particular those in retail and leisure sectors, may lead to increased footfall at their sites, both by attracting customers to them and through them staying there for the duration of their charge.

The Council adopted the Aberdeen Electric Vehicle Framework (CDXX) at its City Growth and Resources Committee in February 2021. It predicts a huge growth of plug-in vehicles in the City up to both 2025 and 2030 and identifies the types and numbers of charge points needed to support them, the locations and the associated supporting measures. Aberdeen City Council is already delivering additional charging infrastructure at Frederick Street car park and has secured £675,000 of funding, as part of the Council's Non-Housing Capital Plan over the next five years, to help with further implementation of the chargers required in the Framework. The intention is for the Framework to be a City-wide document whereby as well as the Council being involved, it can encourage other organisations to provide charging infrastructure by providing evidence of increasing demand for Electric Vehicle infrastructure and outlining locations in the City which could cater for this. Union Square, Tesla, Aldi, Instavolt and Shell are amongst those non-Council organisations who have provided publicly available charging infrastructure in the City to date.

The Proposed Local Development Plan 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. These will vary for each development. The extant Transport and Accessibility Supplementary Guidance, which will be carried forward as Aberdeen Planning Guidance, already

encourages developers and businesses to provide appropriate charging infrastructure for new development.

There are currently no requirements within Building Standard Technical Handbooks for electric vehicle charging in Scotland. There are ongoing discussions in England on the intention to introduce legislation and incorporate electric vehicle charging into building regulations however this is not applicable to Scotland. Therefore, the Proposed Local Development Plan does not duplicate or contradict any Building Standards requirements with regards to electric vehicle charging infrastructure.

In relation to network capacity issues, 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 actively engages with our local DNO, Scottish and Southern Energy (SSE). Discussions have highlighted how future plans may impact upon the grid and SSE are aware of the need to further develop supply infrastructure to support the shift to Electric Vehicles. Existing guidance also encourages developers to engage early with SSE to ensure that new developments have sufficient power requirements built in from the start. As well as relying on the grid, developers are encouraged to look to other grid-balancing technologies such as solar panels and battery storage as alternatives.

With regards to planning policy focusing on only one technology, paragraph 11.27 of the Proposed Local Development Plan shows the Council is supportive of the development and trial of technological advances which not only include electrical vehicles but also hydrogen fuel cells. The Council has continued to build its reputation as a global energy innovator with its fleet of 70 hydrogen vehicles with a combination of single and double decker buses, vans, cars, waste trucks, road sweepers and pedelecs. The 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.

Reporter's conclusions:

Reporter's recommendations:

Issue 36	POLICY CI1: DIGITAL INFRASTRUCTRE	
Development plan reference:	Pages 95 - 96	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Stewart Milne Homes (717) Barratt North Scotland (891) CALA Homes (North) Ltd (900)		
Provision of the development plan to which the issue relates:	Support digital connectivity	
Planning authority's summary of the representation(s):		
<p><u>Policy CI1 - Digital Communication</u></p> <p>717: Commends desire for efficient communication. Connection speed cannot be guaranteed by housebuilders. New housing development can only connect to communication infrastructure.</p> <p>891: Agree new development should benefit from high speed broadband connections. City Council should collaborate with infrastructure providers to ensure appropriate connections can be made as development comes forward.</p> <p>891, 900: Concerned policy wording places burden on housebuilders. Connectivity is dependent on a third party provider.</p>		
Modifications sought by those submitting representations:		
<p><u>Policy CI1 - Digital Infrastructure</u></p> <p>717: Delete reference to residential development, with consequential changes to paragraph 11.35.</p> <p>891: Modify policy to read "<i>All new commercial development and residential development where five or more units are proposed will be expected to connect to high-speed communications infrastructure where such infrastructure is available.</i>"</p> <p>900: Remove policy from Proposed Local Development Plan.</p>		
Summary of responses (including reasons) by planning authority:		
<p><u>Policy CI1 - Digital Infrastructure</u></p> <p>717, 891: Commendation and agreement noted and welcomed. High-speed broadband and efficient communication are essential to the creation of sustainable communities.</p>		

717, 891, 900: The Vision and Objectives of the Proposed Local Development Plan align with the Aberdeen City and Shire Aberdeen City and Shire Strategic Development Plan 2020 (CDXX). One of the targets in the Strategic Development Plan is *“for all new development to have the use of modern, up-to-date high-gigabit speed telecommunications networks”* (CDXX page 45). The Proposed Local Development Plan reflects this requirement through Proposed Policy C11. It also reflects the policy principles supporting digital connectivity in paragraph 293 of Scottish Planning Policy 2020 (CDXX) and the development planning requirements set out in paragraph 297 (page 66) of the same document: *“policies should encourage developers to explore opportunities for the provision of digital infrastructure to new homes and business premises as an integral part of the development. This should be done in consultation with service providers so that appropriate, universal and future-proofed infrastructure is installed and utilised.”*

Both the public and private sectors will need to work together in order to deliver digital infrastructure. Existing improvements to digital infrastructure are funded through both public and private investment supported by grants from the United Kingdom and Scottish Governments. Aberdeen was 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 City which will help to create an inclusive society. This has been undertaken in partnership with the Council, Vodafone and CityFibre, further highlighting the importance of public and private sector collaboration.

Scotland’s Fourth National Planning Framework Position Statement (CDXX) reiterates the intention to support digital connectivity throughout the country. It would therefore not be appropriate to remove this policy from the Proposed Local Development Plan.

Reporter’s conclusions:

Reporter’s recommendations:

Issue 37	POLICIES B1, B2, B3: SUPPORTING BUSINESS AND INDUSTRY, AIRPORT	
Development plan reference:	Pages 97 - 100, City Wide Proposals Map	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Buccmoor LP (579) Aberdeen International Airport (788) Kemble Estates Ltd (792) Castlehill and Pittodrie Community Council (843) Drum Property Group (859) NatureScot (888) CALA Homes (North) Ltd (900) HFD Group Ltd (905) Jupiter Seafield (1075) HFD Group Ltd (1145)</p>		
Provision of the development plan to which the issue relates:	Support business and industrial use in the correct location; Support for development at Aberdeen International Airport; and development criteria	
Planning authority's summary of the representation(s):		
<p><u>General</u></p> <p>843: Pleased to see continued support for the Aberdeen Energy Park and Aberdeen Innovation Park. Notes the need to diversify economy beyond oil and gas, build on existing skills and look towards emerging fields and industries. Facilities should be based locally to spread wealth. Supports focus on innovation, research and manufacturing, renewable energy, and other industries.</p> <p><u>Policy B1 - Business and Industry</u></p> <p>579: Amend Policy to identify supporting uses, which should include: Class 1 (Shops); Class 2 (Financial, Professional and Other Services); Class 3 (Food and Drink); Class 8 (Residential Institutions); Class 10 (Non-Residential Institutions) and Class 11 (Assembly and Leisure). Policy should state such uses will be supported as they will regenerate business and industrial areas. Existing policy wording is ambiguous "<i>may be permitted ... facilities aimed at meeting the needs of businesses and employees within the business and industrial areas rather than the wider area.</i>" Text supporting policy should provide examples of uses that would be permissible. Certain uses will extend beyond the needs of businesses and employees within the business and industrial areas, leading to a regeneration of B1 areas.</p> <p>792: Suggests Policy wording changes to read: "<i>Facilities that directly support business and industrial uses, such as class 3 uses, may be permitted where they enhance the attraction and sustainability of the city's business and industrial land. Such facilities should</i></p>		

generally be aimed at supporting the needs of businesses and employees within the business and industrial area."

888: Replace the word 'footpath' with the word 'path' to align with use of 'path' in the rest of the Plan, to allow greater access of modes of travel.

900: Supportive of the range of employment site allocations. Suggests policy should be modified to permit alternative uses on business and employment sites under specific circumstances, and subject to predefined criteria. Not all land zoned for business and employment uses will be developed, due to a site's poor location or no market for employment development. Consideration should be given to residential uses where a site has not come forward for employment uses but is well located for residential development. Given the expectation that allocated sites will be developed, alternative developments are preferable to deallocation. Respondent notes that a permitted change to use Class 9 would only be appropriate where a site is well located for this use, such as adjacent to an existing settlement. Residential development on an employment site could not prejudice any existing or proposed employment development. Refers to similar cases at Abbotswell Road and St Machar Road which were departures from the Plan. A policy amendment would negate the need for future departures.

905: Plan should make clear reference in Policy to include the following land uses: shops, hotels, leisure and sports uses, creches and children's nurseries.

1145: Notes policy aim is to allocate land for business and industrial uses and allows supporting facilities. Welcomes policy wording as it encourages a mixed use approach which will enhance the ability to attract occupational interests. However, perceives the introduction of additional supporting uses will not address viability issues if some areas are simply no longer able to sustain the values required to justify investment in refurbishment or new development. Given the policy wording, respondent is uncertain if the City Parks site can accommodate industrial uses due to the relative proximity of the site to residential areas on the west of Wellington Road.

Policy B2 - Business Zones

579: Policy should allow Class 5 and Class 6 uses in addition to the Class 4 uses at the Energy Park, as per the extant Local Development Plan 2017. Wording of Policy restricts the appropriate uses permitted on this part of the site. Text supporting Policy should provide examples of uses that would be permissible - Class 1 (Shops); Class 2 (Financial, Professional and Other Services); Class 3 (Food and Drink); Class 10 (Non-Residential Institutions) and Class 11 (Assembly and Leisure). Certain uses will extend beyond the needs of businesses and employees within the business and industrial areas, leading to a regeneration of areas.

Amend Policy to identify supporting uses on the Aberdeen Innovation Park, which should include: Class 1 (Shops); Class 2 (Financial, Professional and Other Services); Class 3 (Food and Drink); Class 8 (Residential Institutions); Class 10 (Non-Residential Institutions) and Class 11 (Assembly and Leisure). Policy should state such uses 'will be' supported. Remove the following text: '*Such facilities should be aimed at meeting the needs of businesses and employees within the business and industrial areas rather than the wider area*' The Aberdeen Innovation Park is not attracting investors. Alternative uses should be allowed to support the Class 4 use, and the general vibrancy and vitality of the Park. Rigid

land zoning is no longer appropriate. Flexibility is required to ensure continued employment creation and economic growth.

859: Amend policy to allow greater flexibility for Business Zones to accommodate alternative uses.

1075: Object to policy wording. Too restrictive to support business and does not provide certainly over uses permitted with Business Zones. There needs to be greater flexibility in the range of uses. Paragraphs 33 and 45 in Scottish Planning Policy support dynamic and flexible approach to realising economic opportunities. The Aberdeen City and Shire Strategic Development Plan 2014 and Proposed Aberdeen City and Shire Strategic Development Plan 2018 outlined the need to diversity the economy. The Proposed Local Development Plan needs to address current economic challenge. Occupancy rates will not return to pre-2014 levels. The model of Class 4 only Business Zones is outdated. The wording supporting facilities are to be "*aimed primarily at meeting the needs of business and employees with the Specialist Employment Area*" is ambiguous. Seeks clarity on acceptable uses. Wider uses are required in B2 zonings to achieve the aim of diversification. There would be no conflict between existing business uses and new supporting uses. New alternative uses will help to regenerate business and industrial areas and ensure viability in the longer term.

Policy B3 - Aberdeen International Airport and Perwinnes Radar

788: Supports policy. Suggests additional wording should be included to control airport related car parking in off-airport locations.

Modifications sought by those submitting representations:

Policy B1 - Business and Industry

579: Reword policy to include reference to supporting uses: Class 1 (Shops); Class 2 (Financial, Professional and Other Services); Class 3 (Food and Drink); Class 10 (Non-Residential Institutions) and Class 11 (Assembly and Leisure). Policy should state such uses 'will be' supported. Remove the following text: '*Such facilities should be aimed at meeting the needs of businesses and employees within the business and industrial areas rather than the wider area*'.

888: Replace the word 'footpath' in the penultimate paragraph with the word 'path'.

905: Include shops, hotels, leisure and sports uses, creches and children's nurseries in policy.

1145: Policy should include clear reference to the land uses referred to in the accompanying narrative (shops, hotels, leisure and sports uses, crèches and children's nurseries). The Proposed Local Development Plan should include an additional criteria-based policy that will be used to consider alternative uses on brownfield land (including allocated or existing employment sites).

Policy B2 - Business Zones

579: Reword policy to include reference to supporting uses: Class 1 (Shops); Class 2 (Financial, Professional and Other Services); Class 3 (Food and Drink); Class 8

(Residential Institutions), Class 10 (Non-Residential Institutions) and Class 11 (Assembly and Leisure). Policy should state such uses 'will be' supported. Remove the following text: 'Such facilities should be aimed at meeting the needs of businesses and employees within the business and industrial areas rather than the wider area'. Policy should specifically allow Class 5 and Class 6 uses in addition to the Class 4 uses at the Energy Park, as per the extant Local Development Plan 2017.

859: Amend Policy to read as follows: "*In areas that are identified as Business Zones on the Proposals Map, Class 4 (Business) uses 'should be considered with other appropriate or complementary land uses considered where they' maintain an 'appropriate' high quality environment. Facilities that directly support business uses may be permitted where they enhance the attraction and sustainability of the Business Zone for investment. Such facilities should 'generally' be aimed at 'supporting' the needs of businesses and employees within the Business Zone. The Entertainment Complex Aberdeen (TECA) site at Dyce is reserved for exhibition and conference centre purposes and uses that support and are compatible with TECA, such as office, leisure uses, and food and drink uses. This excludes large scale retail."*

1075: Amend Policy to make specific references to uses that would be acceptable: Class 1 (Shops); Class 2 (Financial, professional and other services); Class 3 (Food and Drink); Class 8 (Residential Institutions), Class 10 (Non-Residential Institutions) and Class 11 (Assembly and Leisure). Amend policy to states that *'facilities that directly support business use "will be" permitted'*. Remove the following text: "*aimed at meeting the needs of businesses and employees within the business and industrial areas rather than the wider area.*"

Summary of responses (including reasons) by planning authority:

General

843: Respondent's comments and support are noted and welcomed. The Council supports diversification of the City's economy. The Regional Economic Strategy (CDXX) and its accompanying Action Plan (CDXX) aim to make the Aberdeen City Region a more attractive place to live, work and invest and encourages diversification of the economy through emerging opportunities in sectors including renewables, tourism, food and drink, fisheries, agriculture, life sciences and the creative industries. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) and the Proposed Local Development Plan both support the local siting of businesses to encourage economic growth in the City Region, hence the allocation of land for business and industry use.

Policy B1 – Business and Industry

579, 792, 900, 905, 1145: The policy as drafted states that facilities that directly support business and industrial uses may be permitted where they enhance the attraction and sustainability of the city's business and industrial land. The Council considers there to be enough flexibility within the policy to allow additional uses in locations zoned as B1 where appropriate. Paragraph 12.4 already provides examples where supporting facilities have made an important contribution to the City's employment areas. It would therefore not be appropriate to reiterate this or include specific Use Classes that may or may not be acceptable within the Policy. Where an application is brought forward, this will be subject to the planning process and will be treated on its own merits.

The Local Development Plan review process includes consideration of existing business and industrial allocations and whether they are still fit for purpose. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) requires the Local Development Plan to maintain a ready supply of at least 60 hectares of marketable employment land in suitable locations. In addition, at least 20 hectares of this marketable land should be of a standard which will attract high quality businesses. The Proposed Local Development Plan intends to maintain this supply. The Proposed Local Development Plan zones land for mixed uses where both commercial and other uses are appropriate. Proposed Policy B1 relates to land zoned specifically for employment uses. The Proposed Local Development Plan zones land for other uses such as residential or retail. Proposals for non-business/industrial uses would be more appropriate in such areas.

900: Respondent has made references to previous cases where residential uses were considered acceptable on Business and Industrial land. In the case of Abbotswell Road (P150343 CD XX and CDXX), this application was recommended for approval by the Reporter on appeal (CD XX). Thereafter the site was rezoned in the extant Local Development Plan 2017 (CDXX) as mixed use and was allocated as OP115. In the case of St Machar Road (P161701 CD XX and CDXX), the individual circumstances of the site resulted in a recommendation for approval. The principle of Policy B1 has been carried forward from the extant Local Development Plan 2017 and the outcome of these two cases does not warrant a change in policy direction.

888: Whilst the Proposed Local Development Plan has used the word 'paths' when referring to green infrastructure and outdoor access, the current wording of 'footpath' in Policy B2 has been carried forward from the extant Local Development Plan 2017 (CDXX) and is considered by the Council to be appropriate.

1145: The Proposed Local Development Plan fully supports the redevelopment of brownfield sites. Applications for alternative uses of brownfield land across the City are open to consideration and assessed on their merits. These would be assessed against relevant policies in the Local Development Plan. Proposed Policy D1 – Quality Placemaking already refers to six essential qualities that all development will be considered against. One of these criteria is 'Resource Efficient' which refers to the reuse of existing buildings and brownfield sites. It is therefore not necessary to include an additional criteria-based policy to consider alternative uses on brownfield sites.

Policy B2 – Business Zones

579, 859, 1075: Proposed Policy B2 was prepared with Scottish Planning Policy 2020 (CDXX) and the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) as a guide. The Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) requires the Local Development Plan to maintain a ready supply of at least 60 hectares of marketable employment land in suitable locations. In addition, at least 20 hectares of this marketable land should be of a standard which will attract high quality businesses. The aim of Proposed Policy B2 is to encourage development that contributes to a high-quality environment, thus aligning with the Strategic Development Plan's requirement to maintain marketable employment land for high quality businesses. It is considered that Class 5 and 6 uses would likely compromise the high-quality environment that the Council seeks to create within Business Zones. The Proposed Local Development Plan already identifies areas as Policy B1, where Class 4, 5 and 6 uses are supported.

Suggestions have been made to amend the wording of Proposed Policy B2. The policy states that facilities that directly support business use may be permitted where they enhance the attraction and sustainability of the Business Zone. It is considered that the existing wording is suitable – the purpose of the policy is to safeguard land for high quality employment uses. It would not be appropriate to include specific Use Classes that may or may not be acceptable within the policy. Where an application is brought forward, this will be subject to the planning process and will be treated on its own merits.

With regards to inclusion of wording in the policy referring to additional uses allowed at the Aberdeen Energy Park, this principle has already been established as part of the planning consent for the site whereby limited Class 6 uses were considered acceptable on 20% of the site area (P131483 CD XX and CDXX and P160107 CDXX and CDXX). Whilst this was included in the extant Local Development Plan 2017, the Council does not consider it necessary to reiterate this within the policy going forward. Similarly, it is not necessary to include specific acceptable uses for Aberdeen Innovation Park within the policy.

Policy B3 – Aberdeen International Airport and Perwinnes Radar

788: Support for policy noted and welcomed. There is a suggestion to include additional wording in the proposed policy. The Council considers the current proposed wording to be appropriate. Individual proposals for car parking in off-airport locations will be assessed against Proposed Policy T3 – Parking, and any other relevant policies in the Proposed Local Development Plan.

Reporter's conclusions:

Reporter's recommendations:

Issue 38	POLICIES B4, B5, B6: HARBOUR, ENERGY TRANSITION AND PIPELINES	
Development plan reference:	Pages 100 - 101, City Wide Proposals Map, Additional City Wide Proposals Map (Constraints Map)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Shell UK Limited (730) Opportunity North East (887) NatureScot (888) Aberdeen Harbour Board (910) West Craigton Farm (915) INEOS FPS Ltd (1094)</p>		
Provision of the development plan to which the issue relates:	Support for development at Aberdeen Harbours; criteria for the Energy Transition Zone; and ensure developments follow safety procedures for pipelines, major hazards and explosive storage sites.	
Planning authority's summary of the representation(s):		
<p><u>Policy B4 - Aberdeen Harbours</u></p> <p>887: Paragraph 12.11 and 12.13 set out the historic and economic importance of Aberdeen Harbour to the city. Respondent notes that the harbour has needed to expand, guided by a Development Framework. Connectivity to this expansion is being explored and supported through the City Region Deal. Welcomes and supports policy, and policy justification that the Harbour is a key gateway. Paragraph 12.14 recognises the need to maximise opportunities at the new South Harbour however this has not been adequately reflected in the policy. Recognises Masterplans are needed to provide detail for future development and engagement with local stakeholders is merited.</p> <p>910: Supports text noting the importance of Aberdeen Harbour, and the inclusion of the North and South Harbours in policy. Paragraph 12.14 notes the importance of South Harbour; however, this is not adequately reflected in the policy. Policy and justification text need to confirm expansion of South Harbour and the allocation of the Energy Transition Zone, including allocation of future land release. The Aberdeen Harbour Board Masterplan 2020 sets out the Economic Vision of the port and future long-term strategy. This includes diversifying and expanding Aberdeen Harbour's core business services and creating the opportunity to include an Energy Transition Zone of national importance. The Masterplan identifies future interventions towards a cleaner, greener harbour.</p> <p>Policy and text need to note longer term aspirations of redeveloping Aberdeen North Harbour. Attached Aberdeen Harbour Board Masterplan should be noted in the policy. Policy text should confirm that it is linked to Policy B5, to support existing and future business at Aberdeen South Harbour.</p> <p><u>Policy B5 - Energy Transition Zones</u></p>		

887: Whilst Aberdeen Harbour is successful, it will need to change and diversify its portfolio. Notes South Harbour was identified as a National Development in the National Planning Framework 3. There has been significant investment in the harbour to enable its transition to future industries. The Aberdeen Harbour Board Masterplan 2020 sets out the Economic Vision of the port. There is need for national, regional and local planning policy to support the harbour as Aberdeen, coupled with the harbour, has a unique economic opportunity to transition from oil and gas to renewables. Sets out economic benefits of the harbour in synergy with the Energy Transition Zone, possible Free Port and Special Economic Zone which have the potential to support Aberdeen's post-Covid recovery. The Proposed Local Development Plan needs to be modified to further strengthen the case for both the harbour and its ability to enable the energy transition.

Supports Energy Transition Zone. Climate Change (Emission Reductions Targets) (Scotland) Act 2019 sets a target date for net zero-emissions by 2045 and supports a transition to low/zero-carbon investment and infrastructure. Aberdeen is ideally placed geographically to capitalise on energy transition opportunities. Policy and justification should reference decommissioning as part of the journey towards energy transition. Policy should confirm that the proposed expansion of South Harbour and allocation of the Energy Transition Zone builds upon the investment to diversify and expand Aberdeen Harbour's core business services. Expansion can include servicing renewables, cruise and ferry facilities and servicing, cargo activities, property rental and storage.

Supports the allocation of OP56 and OP61. No amendments should be made to the Proposals Map, however, the limitation of land around the harbour expansion precludes the necessity for open space on site or landscaping.

888: OP56 St Fittick's Park encompasses the East Tullos Burn Project area. The public funded multi-award-winning project at East Tullos Burn offered many environmental and community benefits. Policy could adversely affect the project area. Queries the reference to include suitable open space enhancements. Suggests this should be more explicit to refer to the protection of the East Tullos Burn Project area, rather than being addressed at a later stage of the planning process.

Refers to Appendix 2 and the requirement for a joint masterplan for OP56, OP61 and OP62. Refers to Energy Transition Zone's National Planning Framework 4 submission and the potential mitigation discussed under the heading 'the development will protect or enhance the quality of a place'. Illustrations in the document highlight areas outwith OP56 for open space and landscape enhancement, however does not mention the wetland project area. Respondent feels it would not be possible to adequately mitigate for the loss of the East Tullos Burn Project area. Leaving consideration to the Masterplan process means a low likelihood of protection will be achieved.

Refers to Policy NE2 Green and Blue Infrastructure which states "*Development proposals will seek to protect, support and enhance the Green Space Network (identified on the Proposals Map)*", and that "*Masterplans will determine the location, extent and configuration of the Green Space Network within the area, and its connectivity with the wider network*". Recommends that given the value and multiple benefits of the East Tullos Burn Project area, protection should be secured within the Plan policy and also within Appendix 2. Advises that protection should extend to the burn, the wetland, its associated wildflower and tree planting and paths (a link is included to a map in their submission SD XX). Respondent recognises that as a result of such protections there may be limited

developable areas remaining and if the allocation is also subject to a range of other constraints.

910: Supports recognition of Aberdeen South Harbour and the Energy Transition Zone. Expand policy to recognise associated port-centric manufacturing and logistics, including existing business, emerging renewable technologies, and decommissioning of oil and gas infrastructure. Requirement to include open space and landscaping on the Energy Transition Zone limits economic opportunity.

915: Generally supportive of approach taken. Amend policy or add second Energy Transition Policy to show support for emerging and innovative proposals, which may come forward within the Plan review timeframe.

Policy B6 - Pipelines Major Hazards and Explosive Storage Sites

730: Supports policy and paragraph 12.15. Supports identification of consultation zones in Proposals Maps and site-specific allocation descriptions. Requirement to consult with the Health and Safety Executive is supported and should be continued. Important safeguarding policy and its retention is essential in accordance with Paragraph 99 and 107 in Scottish Planning Policy. Notes further guidance is available in Circular 3/2015. Notes their response to the Proposed Aberdeen City and Shire Strategic Development Plan 2020 and the Reporter's recommendations into that Plan.

Requests Pipeline Consultation Zones are recognised, and allocations are made in accordance with relevant Health and Safety Executive advice and guidelines, if any new or expanded allocations are made post-publication of the Proposed Local Development Plan or as part of the Examination. Any new development allocations in close proximity to the pipelines must accord with Policy B6.

1094: Supports policy. Policy ensures consultation between both Health and Safety Executive and pipelines operations where a development proposal is located within the consultation zones for pipelines. Policy should be retained as proposed.

Modifications sought by those submitting representations:

Policy B4 - Aberdeen Harbours

887, 910: Modify first sentence in paragraph 12.11 to read: "*Aberdeen Harbour currently plays a critical role in the economy of Aberdeen and Scotland as a whole.*"

887: Modify paragraph 12.13 from fourth sentence to read: "*In addition, there is now the potential to review the role of both harbours to secure an energy transition from oil and gas, to encourage low carbon energy development and alternative fuels production, assembly and distribution in association with the harbour. This policy is linked to additional allocations and safeguarded areas identified in Policy B5 Energy Transition Zone. Access to the Aberdeen South harbour will be facilitated by improved external links funded through the City Region Deal. The proposed expansion of South Harbour and allocation of the ETZ builds upon the investment of AHB at South Harbour and recognises the significant opportunity to continue to diversify and expand Aberdeen Harbour's core business services, which include oil and gas operations, servicing renewables, cruise and ferry facilities and servicing, cargo activities, property rental and storage, whilst also creating the opportunity to include an energy transition zone of national importance, which*

supports port-centric manufacturing and distribution; renewables; offshore technology; decommissioning and energy transition. There is a need to allocate land surrounding South Harbour to support growth and energy transition."

Modify final sentence in paragraph 12.14 to read: *"Complementary masterplans must then be prepared with local stakeholders including the communities, to provide further detail."*

910: Modify paragraph 12.13 from fourth sentence to read: *"In addition, there is now the potential to review the role of both harbours to secure an energy transition from oil and gas, to encourage low-carbon energy development and alternative fuels production, assembly and distribution in association with the harbour. This policy is linked to additional allocations and safeguarded areas identified in Policy B5 Energy Transition Zone. Access to the Aberdeen South harbour will be facilitated by improved external links funded through the City Region Deal. The proposed expansion of South Harbour and allocation of the ETZ builds upon the investment of AHB at South Harbour and recognises the significant opportunity to continue to diversify and expand Aberdeen Harbour's core business services, which include oil and gas operations, servicing renewables, cruise and ferry facilities and servicing, cargo activities, property rental and storage, whilst also creating the opportunity to include an energy transition zone of national importance, which supports port-centric manufacturing and distribution; renewables; offshore technology; decommissioning and energy transition. There is a need to allocate land surrounding South Harbour to support growth and energy transition, and the safeguarding of additional land for further technical assessment and future release where it is demonstrated to be appropriate and necessary, to fully realise the potential for a Freeport or Special Economic Zone."*

Add the following to the end of paragraph 12.14: *"Aberdeen Harbour Board have prepared a Masterplan in 2020 to assess and promote the potential to maximise the development opportunities from this significant investment, to update the economic position to understand the economic risks and opportunities and inform the required land and safeguarding allocations and the development of policy at a local, regional and national level."*

Add the following between the first and second paragraph of Policy B4: *"Additional Harbour allocations and safeguarded sites for additional energy transition and port-centric manufacturing and logistics to support a potential Freeport/Special Economic Zone bid will be confirmed through Policy B5 Energy Transition Zone and Opportunity sites 56, 61, 62 and 64. On Aberdeen Harbour Safeguarded Sites, green belt policy (NE1) and green space network policy (NE2) will continue to apply unless there is an overriding economic requirement to develop these sites in support of South Harbour and this is confirmed through an agreed masterplan. Any subsequent planning applications would need to be accompanied by an Environmental Impact Assessment to allow assessment of potential significant environmental impacts. Development of North Harbour to secure improved transformative placemaking to improve the City Centre offer, creating a new City Centre waterfront destination, and operating harbour for work, art, music, food, culture, technology, energy and living and improved connections to the city centre and beach will be supported within the boundary defined on the Proposals Map, provided proposals accord with an approved masterplan."*

Requests the Aberdeen Harbour Masterplan 2020 be included as one of the Proposed Local Development Plan's associated documents alongside the Nigg Development Framework and the Energy Transition Zone Feasibility Assessment.

Policy B5 - Energy Transition Zones

887: Add the following new policy justification paragraphs:

12.16: *"South Harbour represents a significant investment by Aberdeen Harbour to secure its future through the retention of existing and transitioning business and through diversification to attract new future industries and opportunities".*

12.17: *"Aberdeen Harbour continues to perform a pivotal role in the wider economy of Aberdeen and Scotland. Its role is not only supporting existing businesses within the oil and gas and port-centric manufacturing sectors, but in retaining and supporting the future of Aberdeen's economy through energy transition and tourism".*

12.18: *"Aberdeen has a unique economic climate, with an existing critical mass of activity and skills that can be diversified. The economic opportunity around energy transition is immense and the benefits significant. The redeployment of skills, expertise and technology from the oil and gas sector into renewables would, over time, help retain high value businesses, jobs and skills in the region. Creating a critical mass of activity and technology around energy transition in one location offers the potential to maximise the impact as the cluster attracts investment, skills, and technology and becomes the natural home for associated activities such as centres of excellence and specialist research. This would have the dual effect of reinforcing Aberdeen's profile as Europe's Energy City whilst retaining its high GVA contribution. It represents a once in a generation opportunity. Aberdeen's competitor ports do not have this critical mass of high value jobs and skilled labour in their hinterlands. Therefore investment in the Aberdeen cluster as an Energy Transition Zone, Free Port or Special Economic Zone demonstrates a stronger economic case with genuine agglomeration effects and wider economic benefits.*

Specifically, with regards to clean energy, South Harbour presents the following opportunities:

- *Encourage low-carbon energy development and alternative fuels production;*
- *Encourage local industry growth through energy-centric manufacturing, assembly and distribution;*
- *Create an 'Energy Transition Zone' aimed at supporting the delivery of low and zero carbon technologies; and*
- *Placing Aberdeen at the forefront of this emerging industry and a key beneficiary of the clean energy generation facilitating a circular economy."*

Respondent requests the following modifications to the policy:

- Remove the requirement for the allocated sites to provide open space and landscaping within an area of critical economic importance and which is limited in terms of location and size. Identify and confirm open space improvements and landscaping within the wider area through further masterplanning.
- Allocation of OP56 should accord with the proposed transport route identified as an option in the Scottish Transport Appraisal Guidance (STAG) assessment.

Amend Policy B5 wording to read: *"Within the areas identified as Energy Transition Zone on the Proposals Map, there will be a presumption in favour of the development, production, assembly, storage and/or distribution of infrastructure required to build upon*

the nationally important infrastructure investment at South Harbour to enable a significant economic opportunity to continue to diversify and expand the core business services at the harbour, which include oil and gas operations, servicing renewables, cruise and ferry facilities and servicing, cargo activities, property rental and storage. It also creates the opportunity to include an energy transition zone of national importance, which supports port-centric manufacturing and distribution; offshore technology; decommissioning, energy transition and renewable energy; this includes offshore wind, tidal, hydrogen and solar and other emerging renewable technologies. Infrastructural/transport improvements directly related to the wider Energy Transition Zone will be permitted where they have a functional requirement to be located there."

888: Amend policy to include the following sentence *"Development must retain the amenity value of, and avoid any adverse impacts upon the East Tullos Burn and its associated wetland, and areas of wildflower and tree planting"*.

910: Modify policy text to read: *"Within the areas identified as Energy Transition Zone on the Proposals Map, there will be a presumption in favour of the development, production, assembly, storage and/or distribution of infrastructure required to build upon the nationally important infrastructure investment at South Harbour to enable a significant economic opportunity to continue to diversify and expand the core business services at the harbour, which include oil and gas operations, servicing renewables, cruise and ferry facilities and servicing, cargo activities, property rental and storage. It also creates the opportunity to include an energy transition zone of national importance, which supports port-centric manufacturing and distribution; offshore technology; decommissioning, energy transition and renewable energy; this includes offshore wind, tidal, hydrogen and solar and other emerging renewable technologies. Infrastructural/transport improvements directly related to the wider Energy Transition Zone will be permitted where they have a functional requirement to be located there"*.

915: Add the following text to the Policy:

"Outside of the Energy Transition Zones the Council will support innovative or exemplar projects to energy production and provision and its use where that is considered an integral approach to those developments and they meet the Council's Net Zero and Energy Transition aims."

Policy B6 - Pipelines Major Hazards and Explosive Storage Sites

730: The Council should take account of and reflect the advice and guidance of the Health and Safety Executive relating to any new or amended development allocations being considered in close proximity to Pipeline Consultation Zones.

Summary of responses (including reasons) by planning authority:

Policy B4 – Aberdeen Harbours

887, 910: Support for policy is noted and welcomed. We consider the existing wording in paragraphs 12.11, 12.13 and 12.14 of the Proposed Local Development Plan to be appropriate. Paragraph 12.11 refers to the critical role of the harbour in the economy of the City and of Scotland, and therefore highlights the harbour's economic importance. The Council considers the reference to Aberdeen North Harbour in paragraphs 12.11 and 12.12 to be appropriate. Paragraph 12.12 refers to the existing Development Framework

(CDXX) which notes the longer term aspirations of redeveloping Aberdeen North Harbour. The Council does not consider it necessary to further note the longer-term aspirations of redeveloping Aberdeen North Harbour in the Proposed Local Development Plan than has already been done when this is extensively covered in an existing Development Framework.

Paragraph 12.13 refers to both the existing harbour and the new Aberdeen South Harbour whilst underlining the potential opportunities for low carbon energy development. It would not be appropriate to name the specifics of the Harbour's core business services or of the potential new services at the South Harbour as part of this paragraph as paragraphs 12.16, 12.17 and Policy B5 already cover the Energy Transition. This matter is dealt with in the following section of this Issue under Policy B5 – Energy Transition Zones.

Paragraph 12.14 refers to complementary Masterplans that will be prepared to provide further detail on the Aberdeen South Harbour. Appendices 2 and 3 of the Proposed Local Development Plan note that a new Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zones at Bay of Nigg (OP56, OP61 and OP62) will be prepared and adopted as Aberdeen Planning Guidance. In accordance with Technical Advice Note: Aberdeen Masterplanning Process (CDXX), the Council encourages the landowner and/or developer, in co-operation with the local authority, to produce a Masterplan.

The final and detailed contents of the Joint Masterplan will be decided by the Council. However, this will take place following consultation with developers, key agencies and the public, in the same way that consultation was undertaken on the current Bay of Nigg Development Framework (CDXX). This will take place after the Examination when the final wording of the Local Development Plan policies will be known. This means that everyone will be able to comment at the appropriate level of policy detail at the appropriate time. Whilst the Council understands and appreciates that Aberdeen Harbour Board have prepared a Masterplan to assess and promote the potential opportunities of the Aberdeen South Harbour, this however, was undertaken outwith the Aberdeen Masterplanning Process (CDXX) and is not an adopted Aberdeen City Council document. It would therefore not be appropriate to include it as part of paragraph 12.14 or Proposed Policy B4 or as an associated document of the Proposed Local Development Plan.

Suggestions have been made to amend the wording of Proposed Policy B4. It is considered that the existing wording is appropriate – the purpose of the policy is to safeguard land around the harbours for harbour-related uses. Individual planning proposals will be assessed against any additional relevant policies in the Local Development Plan. Appropriate environmental assessments including a Habitats Regulations Appraisal, a Flood Risk Assessment and a Transport Assessment will be required as per Appendix 2 when it comes to any proposals within areas zoned as Aberdeen Harbour on the Proposals Map.

Policy B5 – Energy Transition Zones

887: The support for the Energy Transition Zone and allocations of OP56 St Fittick's Park and OP61 Doonies is noted and welcomed. The economic success of Aberdeen Harbour is understood as are its efforts to diversify economically. The status of the Aberdeen Harbour South expansion in the National Planning Framework 3 is understood by the Council and is well established in all tiers of the Development Plan. This matter is considered in further detail in the response to Issue 17: Allocated Site OP56 and OP61 Energy Transition Zone, and other Allocated Sites: Torry.

It is considered that the Proposed Local Development Plan provides sufficient policy support for Aberdeen's Harbours to be successful both economically and facilitate their role in energy transition. Both harbours are supported by Proposed Policy B4 – Aberdeen Harbours and this is in turn complemented by Proposed Policy B5 – Energy Transition Zones which informs the allocation of sites adjacent and in proximity to Aberdeen Harbour South. These sites will focus specifically on Energy Transition and can work synergistically with Aberdeen Harbour South. The progression of concepts such as Free Ports or Special Economic Zones are the responsibility of the Scottish and United Kingdom governments and are beyond the scope of a Local Development Plan. If such concepts are to be progressed in the future, they can be considered as part of the Development Plan review. At this point in time, while aspirational and innovative, the concepts have not been sufficiently progressed nor committed to warrant reference in the Proposed Local Development Plan.

888: The benefit of the environmental and habitat remediation works to the East Tullos Burn, supported by public funding and community groups, is understood and not disputed. The allocation of OP56 St Fittick's Park, should it be developed, would result in the loss of areas of St Fittick's Park and possibly parts of the East Tullos Burn. While it is indeed unfortunate that the development of the site would result in this, a broader view, of local, national and international economic and environmental issues, has influenced the site's allocation. This is addressed in detail in the Council's response to Issue 17: Allocated Site OP56 and OP61 Energy Transition Zone, and other Allocated Sites: Torry.

Proposed Policy B5 – Energy Transition Zone includes requirements for suitable open space and landscape enhancements for the wellbeing of people and wildlife. It is acknowledged that such open space or habitat, following development, would not replicate that which is currently in situ. The respondent considers that the policy and Appendix 2 'Other Factors' should be more strongly worded to ensure that protection extends to the burn, the wetland, its associated wildflower and tree planting and paths. The Council considers that there is sufficient wording in both Proposed Policy B5 and Appendix 2 'Other Factors' in conjunction with a subsequent Masterplan. These in combination with the development of a masterplan would be a more appropriate mechanism to determine the specifics of recreational access, habitat connectivity, compensatory planting and landscape buffering with residential areas.

If the policy wording was altered to reflect the requests of the respondent and, as is asserted, to align with the requirements of Policy NE2 this would require explicitly stating that protection should extend to the burn, the wetland, its associated wildflower and tree planting and paths (SD XX a link is included to a map in their submission). Such components have not been mapped to an extent where their boundaries are either defined or agreed – such an undertaking would achieve the granularity required through a masterplanning process. Should this be set aside in the Proposed Local Development Plan and not be developable as the respondent requests it is likely that this would remove flexibility from the masterplanning process and undermine the viability of the Energy Transition Zones as a substantial proportion of the allocation would be undevelopable. As such it is considered unevicenced and premature.

It is recognised that there is discretion, as provisioned under Proposed Policy NE3 which states "*Where detrimental effects are still unavoidable, development will only be supported where these adverse effects are clearly outweighed by social, environmental or economic*

benefits at a level which is at least equal to the designation's or species' importance (international, national or local)".

It is considered that the wider environmental and economic benefits of the Energy Transition Zone outweigh its disbenefits. If Policy B5 were to be amended as prescriptively as is suggested by the respondent this would curtail innovative responses to particularities of the site to enable viable delivery and a solution that works for all stakeholders. In terms of the weight to be applied to each policy, there is commitment to all the policies, with the need for an integrated approach to the delivery of the Proposed Local Development Plan's Vision. The policies carry equal weight and importance and need to be taken into account in the decision-making process. Balancing often conflicting interests in different situations is a large part of the planning process.

The respondent refers to Aberdeen City Council's submission for National Projects for the emerging National Planning Framework 4 (CD XX). The Council's submission supports of the Energy Transition as a candidate national project in the emerging National Planning Framework 4. The context of this submission should be viewed at the level of its submission. It is not possible to submit a proposal to the National Planning Framework which would detail every aspect of the final delivered scheme. That is why there are tiers to the development planning process. The finer details become more apparent and refined the closer a proposal comes to applying for planning permission.

910: The support for the Energy Transition Zone is noted. It is considered unnecessary to extend the policy beyond its current scope or to include reference to port-centric activities. Such activities are supported through Policy B4 – Aberdeen Harbours which covers both Aberdeen Harbour and Aberdeen South Harbour expansion. The Energy Transition Zones is not an ancillary allocation to Aberdeen Harbour South. It is a separate allocation and policy framework which will enable standalone development which complements and benefits from its proximity to the Harbour.

887, 910: Given the site's landscape character, its coastal context and proximity to existing green space is it considered entirely appropriate that Policy B5 requires the inclusion of suitable open space and landscape enhancements for the wellbeing of people and wildlife.

887, 910: It is not considered appropriate to include reference in the policy to the decommissioning of oil and gas infrastructure. Such activities were not considered in the Energy Transition Zone feasibility study (CD XX) nor consulted upon through the Proposed Local Development Plan consultation. The feasibility study describes energy transition as 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 and solar. Policy B5 and the allocations of OP56 St Fittick's Park and OP61 Doonies have been considered in order to support the Council's and the National objectives to move towards Net Zero and create a cluster of development which can achieve this. It is considered that decommissioning would be counterproductive if located at the same site. Furthermore, it is not considered to be within the scope nor the spirit of the Energy Transition Zone.

The move to low carbon energy will mean a need for decommissioning and the potential for capture of waste streams. However, there is the potential for some of these waste streams to be contaminated (classed as hazardous) requiring specific treatment. The Energy Transition Zone would be located relatively close to established residential areas. There is also the potential for use of water and energy in the decommissioning process

which may not align with Energy Transition Zone policy if this is to take place within proximity of allocated sites. If this is to take place off-site and it is to be used as a point for waste segregation for treatment elsewhere there will be an increase in transport activity which would need to align with Proposed Policy T2 Sustainable Transport and which could result in an increase in transport emissions. The Scottish Environment Protection Agency regulate the decommissioning process and it would require assessment on their part to determine if such an activity was appropriate at this location.

915: Support for the policy is noted. It is not considered necessary for additional policy support for emerging and innovative proposals which would support the energy transition as there is nothing in the Proposed Local Development Plan that would preclude such proposals from coming forward. Such proposals would be supported through the substantial allocations of employment land in the Proposed Local Development Plan and Policy B1 – Business and Industrial Land.

Policy B6 – Pipelines Major Hazards and Explosive Storage Sites

730, 1094: Support for Proposed Policy B6 is noted and welcomed. Proposed Policy B6 was prepared with Circular 3/2015 (CDXX) as a guide and aligns with paragraph 99 of Scottish Planning Policy 2020 (CDXX) which expects development to maintain appropriate distances between sites and hazardous substances. Paragraph 12.15 and the proposed policy also make clear that consultation with the Health and Safety Executive will be required where development is proposed within consultation zones for pipelines sites. Pipelines will continue to be protected through Proposed Policy B6. They are marked on the Proposed Local Development Plan's Additional City-Wide Proposals Map for consideration by Planning Officers when assessing development proposals. Pipeline zones are included as part of the sustainability criteria when it comes to the assessment of sites for allocation in the Local Development Plan – therefore, any new or expanded allocations will be considered against these criteria.

Reporter's conclusions:

Reporter's recommendations:

Issue 39	ENVIRONMENTAL REPORT: STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATIONS APPRAISAL	
Development plan reference:	Pages 108 - 123	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scottish Forestry (122) Colin Higgins (655) Joe Burn (656) Rodrigo Rendon (710) Historic Environment Scotland (752) Stewart Milne Homes (886) NatureScot (888) Scottish Environment Protection Agency (892) Scottish Government (896) John Webb (1020) The New Aberdeen Mosque and Community Centre Project (1146) Gordon Inglis (1163) Carmenza Inglis (1168)</p>		
Provision of the development plan to which the issue relates:	Identifies key environmental issues, assesses significant effects and mitigations where appropriate	
Planning authority's summary of the representation(s):		
<p><u>Strategic Environmental Assessment</u></p> <p><u>General Comments and Support</u></p> <p>892, 896: Respondent is satisfied that all relevant Plans, Policies and Strategies listed in Appendix 3 have been considered in the Environmental Report.</p> <p>892, 896: Respondent is generally satisfied that the Strategic Flood Risk Assessment (SFRA) has adequately informed the site assessment process and the mitigation measures put forward. However, respondent provides detailed comments on specific site flood risk assessment in their Proposed Local Development Plan response and these should be taken forward into the Adopted Plan and the finalised Environmental Report.</p> <p>892, 896: Respondent welcomes additional environmental problems listed in Table 5.3. Respondent thanks the Council for providing them with up to date shape files in order for them to independently assess them.</p> <p><u>Ancient Woodland</u></p> <p>122: Requests that a number of Site Assessments be amended in the Strategic Environmental Assessment in order to assert a strong presumption against development</p>		

due to the presence of Ancient Woodland. They are OP9, OP20, OP25, OP63, OP31, OP50, OP53, OP112, OP113, OP46 and OP56

Anti-Social Behaviour

655, 656, 710: Further explanation required on how the Local Development Plan will safeguard mitigation action on anti-social behaviour. Queries whether the Strategic Environmental Assessment is required to assess anti-social behaviour issues that negatively affect physical or mental health of residents.

Landscape

886: The respondent disputes the Strategic Environmental Assessment referring to B0933 as a stand-alone development when considering its impact on landscape. The respondent states that the development would be an expansion to Westhill.

Post Mitigation

1163, 1168: Respondent requests that the Strategic Environmental Assessment for OP53, OP112, OP113, B0901, B0905, B0911, B0927 is reassessed particularly it's section on post mitigation. Respondent states that the Strategic Environmental Assessment is superficial and does not answer the criteria set.

OP56 St.Fittick's Park and OP61 Doonies

888, 892, 896: Outlines how in their view the Environmental Report under-represents the importance of OP56 St Fittick's Park (in terms of its value to people, wildlife and flood management) and also under-represents the likelihood of adverse environmental effects, including post mitigation. The respondent observes that it would appear that the East Tullos Burn Project area has not been included in the Policy B5 and OP56 assessments. The respondent considers that all the benefits that the project has delivered (and the available North East Scotland Biological Records Centre records) have not been considered in the topics within the assessments. This is noting that the East Tullos Burn Project area takes up most of the undeveloped open space within OP56, which itself is a sizeable proportion of the Energy Transition Zone.

752, 896: Respondent highlights that the Energy Transition Zone (OP56 and OP61) has not been assessed in terms of its impact on the historic environment. The environmental assessment of the allocation of land in St Fittick's Park for the Energy Transition Zone does not consider the impact of the proposed land use on the Scheduled Monument St Fittick's Church (SM 10400). Given that the allocation for the Bay of Nigg OP62 - Harbour Expansion, Energy Transition Zone, Green Belt etc does assess the potential impact as having the "*potential to negatively impact on the scheduled monument of St. Fittick's Church*" respondent would have expected the assessment of OP56 to include an assessment of the same site with similar findings. Respondent therefore advises that the assessment be updated to cover this and put forward mitigation for identified effects.

As with OP56, the detailed assessment provided for OP61 Doonies (page 801) has not considered the potential impacts on the site and setting of the nationally important historic environment assets in its vicinity, in this case the Scheduled Monuments of Crab's Cairn (SM 4060), Tullos Cairn, cairn (SM 4055) and Baron's Cairn, cairn (SM 4126). In particular the Crab's Cairn Scheduled Monument lies directly adjacent to the north east corner of the allocation and may form part of a relict prehistoric landscape with the other monuments noted above. It is noted that the assessment for OP64 (Former Ness Tip - Solar Farm) that is being brought forward from the extant plan does offer an assessment on the scheduled cairns in its vicinity and that the potential for adverse effects prior to mitigation is predicted. On this it should be noted that the assessment scores this effect as positive after mitigation without offering explanation of what the positive effect is. The respondent would consider it more appropriate that if mitigation through siting and design served to lessen the impact on the setting of these sites it would be more accurate to consider the residual effect neutral rather than positive. In light of the above omissions regarding the assessment of the allocations relating to the Energy Transmission Zone we would advise that the environmental report be updated to ensure that the need for mitigation is recognised and that the delivery programme reflects this.

1020: Makes comments regarding what they believe to be missing information from the Environmental Report at page 87. The current status of St Fitticks Park as a public park should be clearly stated, plus details of links to the appropriate documentation. Details of previous public investment in the area (e.g. East Tullos Burn restoration) should be laid out, plus details of links to the appropriate documentation. The existence of contaminated land (particularly heavy metals) in the area should be mentioned in the list of "issues to be addressed". Any proposal to reduce the size of an existing public park should be matched by Aberdeen City Council designating a suitable and similar sized alternative area within the Torry community area as a new public park. The existence of strong and persistent odours caused by Scottish Water's nearby Waste Treatment should be mentioned in the list of "issues to be addressed".

OP46 Royal Devenick Park

888, 896: Agrees with the Strategic Environmental Assessment that: "*Development will have a negative impact on the landscape setting of the area*" for OP46 Royal Devenick Park."

888, 896: For OP53 Tillyoch, respondent advises mitigation which goes beyond that identified in the Environmental Report. Respondent advises excluding the woodland area and also providing information demonstrating how the woodland would be protected.

OP85 King Street/Beach Esplanade

1146: Respondent makes the following comments regarding the Strategic Environmental Assessment Assessment for OP85 King Street/Beach Esplanade.

Page 1015 – Water (OP85) Comments for the first two questions show a positive and a negative impact pre-mitigation. This should be scored as +/- pre mitigation, rather than negative only, and as positive (+) post mitigation.

Flood Risk (OP85) Comments for the first two questions show a positive and a negative impact pre-mitigation. This should be scored as +/- pre mitigation, rather than negative only, and as positive (+) post mitigation.

Biodiversity Flora and Fauna (OP85) Comments that the site is "*identified as being an area of potential bat habitat.*" This is scored as (-) pre mitigation and (-/+) post mitigation. Other sites with potential bat habitats are scored as (+) post mitigation and this site to be scored the same.

Climate Change Mitigation (OP85) Text show a positive and a negative impact pre-mitigation. This should be scored as +/- pre mitigation, rather than negative only, and as positive (+) post mitigation. In addition, it should be noted that the design of the building will be as green as possible using the latest green technologies.

Air Quality (OP85) Text show a positive and a negative impact pre-mitigation. This should be scored as +/- pre mitigation, rather than negative only, and as positive (+) post mitigation.

Service Infrastructure (OP85) Landscaping of the site and retention of open space will mean there is no detrimental impact. Notes variety of different existing development around the site. The siting of additional development will have negligible impact on the open character of the area. The land in question has no formal recreational value and there will be no adverse impact on the level of recreational amenity provided by the links. The function of the land as part of a linked open space will not be compromised.

Soils (OP85) Given the mitigation proposed, the post mitigation score should be positive only (+) rather than positive and negative (-/+).

Deliverability/Sustainability Constraints (OP85) In the Climatic Factors and Human Health section the scoring for both pre and post mitigation should be significantly positive (++).

Landscape Designated Sites (OP85) Page 32 of the Strategic Environmental Assessment advises the following "*Impacts on landscape character assessment resulting from the plan are not expected to be significantly changed as the major greenfield allocations made in the 2017 Local Development Plan are being carried forward.*" Given the above, there are the following objections: With regards to the first comments box ,the case highlighted in the Strategic Environmental Assessment for the extant plan remains the same, there is no change to the landscape surrounding the site, there will therefore still be no impact on the landscape due to the surrounding area being partially built up and we request that the wording be changed accordingly. Notes the existing development. Given context there would be negligible impact. Land had no formal recreation value and there will be no impact on the level of recreational amenity. As such function of land will not be compromised. Development would be enhancement of the area due to design, facilities etc. As such, the comments in the Environmental Report cannot be accepted. With regards to the second comments box - The site is outside of the Local Nature Conservation Site and situated away from the River Don Valley. The extant Local Development Plan 2017 stated that there would be no impact on the landscape and this remains the case. Do not agree the site as Prime Landscape. The site is classified in both the extant Local Development Plan 2017 and the current Proposed Local Development Plan as being within "City Centre and Urban Areas" which confirms that it is an 'Urban Area.' It should be noted that in the Environmental Report which accompanied the extant Local Development Plan 2017 in relation to Material Assets and Population, it is stated in

relation to OP85 that *“There will be a positive impact on material assets and population, as the provision of a mosque in this location will provide for the needs of a diverse population and may help to attract people to the city.”*

Water Abstraction

888, 896: Respondent makes comments regarding the Water Abstraction section of the Strategic Environmental Assessment at page 46. Respondent highlights that on page 46 there is a *“Note on the Assessment of Water”*. This says that: *“...Scottish Water have confirmed that the levels of development proposed by the Strategic Development Plan and therefore this Proposed Local Development Plan fall within current licence levels. The issue of water abstraction from the River Dee is therefore not considered as part of this SEA. It is considered to be an issue beyond the scope of this Plan, and it’s associated Environmental Report.”* Respondent queries if this wording draws upon the position taken in an early draft of the Council’s Habitats Regulations Appraisal. Respondent advises that the issue of water abstraction is relevant to the Proposed Local Development Plan, and cannot be discounted because it has been considered in the Aberdeen City and Shire Strategic Development Plan 2020, as a higher level Plan. Respondent goes on to highlight that the Council has considered the potential impact of abstraction within the Habitats Regulations Appraisal under *“Section 6.1.1 Water abstraction impacts on the qualifying interests of the River Dee SAC”*. Respondent welcomes that it has been fully considered there.

Respondent discusses further text at page 46 ‘Note on the assessment of Water’, *“Decisions regarding acceptable water abstraction levels from the River Dee are discussed and agreed between Scottish Environment Protection Agency (SEPA), Scottish Water and SNH”*. Respondent feels it would be more accurate if this were to say: *“Decisions regarding acceptable water abstraction levels from the River Dee may be discussed between Scottish Environment Protection Agency (SEPA), Scottish Water and SNH. The Habitats Regulations Assessment also has a bearing on this issue. The licence for abstraction for the public water supply from the River Dee is held by Scottish Water, and SEPA is the principal regulator of that abstraction licence.”*

888, 896: Respondent also suggests word changes to other text in the Environment Report. There are a large number of entries saying: *“All new development will increase the need to abstract water from the River Dee, with requirements agreed between Scottish Water and SNH.”* Respondent suggests it would be more accurate if it read: *“New development may increase the need for Scottish Water to abstract water from the River Dee for the public supply, with water abstraction licence requirements set by SEPA.”*

Habitats Regulations Appraisal

General Comments and Support

888: Respondent agrees that the Council can conclude that the Proposed Local Development Plan will not have an adverse effect on the integrity of the River Dee Special Area of Conservation in relation to construction pollution impacts.

888: Respondent agrees that the Habitats Regulations Appraisal can conclude that there is no adverse effect on site integrity in relation to loss of foraging habitat for Special Protection Area geese.

888: Respondent is also content that, unless any 'windfall' development sites are concentrated near particular Special Protection Areas, or unless the goose population trends change markedly, it would be appropriate to wait to consider this issue again through the next Local Development Plan cycle (i.e. rather than carrying out re-appraisal for each proposed windfall development).

888: Respondent has considered potential recreational disturbance of qualifying interests at Special Protection Areas. There is a potential impact from development in relation to an assumed increased or redistributed human population causing increased recreational disturbance in the Special Protection Areas themselves. However, taking account of the locations of allocated sites, as well as facilities for visitors and/or visitor management plans, and parking limits, respondent advises that the Council can conclude no adverse effect on the integrity of Special Protection Areas from increased recreational pressure. The Council may wish to also mention this aspect in any update to their Habitats Regulations Appraisal Record.

888: Respondent agrees with the Council's conclusions (page 138-140) that the Proposed Local Development Plan will not have an adverse effect on site integrity of the following qualifying interests: Eider (non-breeding) as a qualifying interest of Ythan Estuary, Sands of Forvie and Meikle Loch Special Protection Area Bottlenose dolphin as a qualifying interest of Moray Firth Special Area of Conservation. Grey seal as a qualifying interest of Isle of May Special Area of Conservation. Respondent states again the importance of having robust wording on European sites at Policy NE3 in order to support these conclusions.

888: Respondent makes comments regarding potential water abstraction impacts. Respondent agrees that based on the Habitats Regulations Appraisal's reasoning, that the Council can conclude that the Proposed Local Development Plan will not have an adverse effect on the integrity of the River Dee Special Area of Conservation in relation to water abstraction. Respondent does however make a relatively minor observation regarding the discussion at page 133/134 of the Habitats Regulations Appraisal related to the Examination of the Aberdeen City and Shire Strategic Development Plan 2014. The Examination into the Aberdeen City and Shire Strategic Development Plan 2020 dealt with a change to housing allowances / land release figures, and based on what respondent has seen (in the June 2020 Scottish Government SEA screening report that concerns proposed modifications arising from the Examination), the respondent understands that *"the practical affect [of the modification] is a small increase in allowances (for 23 units) required overall from 2016 to 2032 and 2033 to 2040, but with a shift in the time period of when these allowances are to be met, i.e. land for more homes (1,879) is required in the first period (2020 –2032) than in the last period (1,856 fewer in 2036 –2040)"*. In slight contrast, the Council's Habitats Regulations Appraisal states on page 133 that *"...Examination of the Proposed SDP has not resulted in any overall increase in housing allowances..."*. Whether there is actually a small (23 unit) overall increase in allowances, or no increase, either way, it would not be a meaningful overall increase in housing allowances, and consequently the reasoned conclusions regarding abstraction would still remain valid.

888: Respondent also notes discussion of windfall sites, and how these might affect abstraction. Page 134 of the Habitats Regulations Appraisal flags that there is existing headroom for an identified level of windfall development in the plan period without going beyond the licenced limit and that there are also means of keeping track of the cumulative level of windfall development. Respondent advises, therefore, that provided the City and

Shire Councils take steps to implement the means of ensuring that the level of windfall development does not exceed the identified headroom, there is unlikely to be a need to consider the abstraction issue afresh (via project level Habitats Regulations Appraisal) for each windfall application.

888: Respondent notes that the Appropriate Assessment conclusions (page 136) are based on the logic that if future development projects were considered likely to cause a likely significant effect, then at that stage project level Habitats Regulations Appraisal would be required as a legislative requirement (as noted under Proposed Policy NE3 - Natural Heritage). Respondent is generally content with this approach, however, in order to support such a conclusion, respondent recommends strengthening wording of Policy NE3 as detailed in separate comments (888/9). Respondent states that proposed changes to NE3 will make the legislative requirements for European sites clearer within the Proposed Local Development Plan, and this will therefore better support the logic the Council use to reach the Habitats Regulations Appraisal conclusions.

River Dee Special Area of Conservation During Construction

888: Respondent makes comments regarding potential impacts on the River Dee Special Area of Conservation during construction. Respondent suggests word changes to the first three paragraphs on page 35 of the Habitats Regulations Appraisal record. Respondent feels that these word changes would make it clearer that the Council will take a detailed look at the risk associated with proposals at the project stage and then assess whether there is 'likely to be a significant effect' on the interests of the Special Area of Conservation.

Word Change on Page 136

888: Respondent suggests that the acronym 'HRA' is replaced with 'Appropriate Assessment' on page 136 in the following sentence, "*if future development projects were considered likely to cause a likely significant effect, then at that stage project level HRA would be required as a legislative requirement (as noted under Policy NE3 Natural Heritage)*"

Specific Comments related to Appendix 2

896: Respondent makes comments on several OP sites in relation to 'Other Factors' section of Appendix 2 (shown in Proposed Local Development Plan and Environmental Report)

OP3: Findlay Farm, Murcar - Flood Risk Section of assessment appears to be missing. Drainage Impact Assessment required to address surface water flood risk. Flood Risk Assessment may be required. Silver Burn runs along part of the south-west boundary.

OP6: WTR Site at Dubford - Comments not taken on board from the Main Issues Report stage. Flood Risk Assessment may be required. (Topographic information may demonstrate the site is sufficiently elevated above the functional floodplain but this is not referenced.)

OP11: Balgownie Area 4 - Comments not taken on board from the Main Issues Report stage. Flood Risk Assessment required potential flood risk from small watercourse (not included within SEPA Fluvial Flood Map).

OP12: Silverburn House - Flood Risk Assessment required potential flood risk from small watercourse (not included within SEPA Fluvial Flood Map). Flood Risk comments provided under application 191904/PPP and requested a Flood Risk Assessment.

OP75: Denmore Road - Flood Risk Assessment required (Glashie Burn runs through site)

OP20: Craibstone South - Flood Risk Section of assessment appears to be missing. Flood Risk Assessment required.

OP21: Rowett South - Flood Risk Section of assessment appears to be missing. Flood Risk Assessment may be required (for part of site not covered by planning consent) The requirement for a Flood Risk Assessment will depend on the location of development within site

OP21. A large part of OP21 has already been considered under separate planning application.

OP22: Greenferns Landward - Flood Risk Assessment required. One watercourse flows through the site and one along the southern boundary. One watercourse flows through the site and one along the southern boundary. Flooding has been recorded on 2 occasions (22/10/2002 and between November 2007 and 2009) by Aberdeen City Council, due to the blockage of a culvert at Newhills Avenue.

OP29: Prime Four Business Park - Flood Risk Assessment may be required (for any part of site not already covered by submitted FRA)

OP40: Cults Pumping Station - Flood Risk Assessment required (possible flooding from Cults Burn) Not clear why site assessment says but site itself not considered to be at risk.

OP53: Tillyoch, Peterculter - Flood Risk Assessment may be required (if development proposed in south east of site adjacent to small watercourse)

OP112: West of Contlaw Road - Flood Risk Assessment may be required (Parts of site at risk of flooding)

OP61: Doonies Flood - Risk Assessment may be required following assessment of small watercourse close to north boundary (not included within SEPA Fluvial Flood Map).

OP65: Haudagain Triangle, Middlefield - Flood Risk Assessment required potential flood risk from small watercourse (not included within SEPA Fluvial Flood Map). Respondent holds reports of flooding on 7.7.2015, adjacent to site. In the vicinity of Auchmill Road near junction with Manor Drive and Auchmill Road near Haudagain Roundabout. For information a Flood Risk Assessment was provided for the adjacent Haudagain roundabout pre-planning enquiry.

OP116: Froghall Terrace - Mitigation measures required against possible groundwater flooding.

Modifications sought by those submitting representations:

Strategic Environmental Assessment

OP56 St.Fittick's Park and OP61 Doonies

888, 896: Respondent requests that their representations on Policy B5 Energy Transition Zones and related OP56 St Fittick's Park are used by the Council to inform the post adoption statement or any revision to the Environmental Report.

OP85 King Street/Beach Esplanade

1146: Amend wording in the first comments box to reflect the text within the Environmental Report for the extant Local Development Plan 2017 which states, in Appendix 6 – Other Opportunity Sites for OP85 that: "*There will also be no impact on landscape due to the surrounding area being partially built up.*" The site is not considered Prime Landscape due to its urban nature and is outside the Local Nature Conservation Site and situated away from the River Don Valley.

Water Abstraction

888,892, 896: The respondent requests the text of page 46 'Note on the Assessment of Water' is amended to read, "*Decisions regarding acceptable water abstraction levels from the River Dee may be discussed between Scottish Environment Protection Agency (SEPA), Scottish Water and SNH. The Habitats Regulations Assessment also has a bearing on this issue. The licence for abstraction for the public water supply from the River Dee is held by Scottish Water, and SEPA is the principal regulator of that abstraction licence.*"

Habitats Regulations Appraisal

888, 892, 896: Amend text of Habitats Regulations Appraisal to read "*New development may increase the need for Scottish Water to abstract water from the River Dee for the public supply, with water abstraction licence requirements set by SEPA.*"

888: Respondent suggests word changes to the first three paragraphs on page 135 of the Habitats Regulations Appraisal record. Amended wording would read: "*It is important to know that any the risk of construction related impacts from Opportunity Sites in the River Dee catchment is suitably low or can be adequately managed. On a precautionary basis, the LDP requires project level HRA to be carried out for all the allocations located within the catchment. At project stage, the Council will appraise the risks of construction, and if it considers that the proposal is likely to have a significant effect it may require submission of an adequate Construction Environmental Management Plan (CEMP). Where the Council considers that a CEMP is required, this could be made subject to a planning condition. The requirement for project level HRA is set out for relevant Opportunity Sites at Appendix 2 of the LDP, and on this basis we are able to conclude (at plan stage) that an adverse effect on site integrity can be avoided. It is worth noting that the Council is also likely to undertake project level HRA for any windfall development located within the River*"

Dee catchment, and similarly should the Council consider it is likely to have a significant effect, it can potentially require the submission of an adequate CEMP."

888: Respondent suggests that the acronym 'HRA' is replaced with 'Appropriate Assessment' on page 136 in the following sentence, "*if future development projects were considered likely to cause a likely significant effect, then at that stage project level HRA would be required as a legislative requirement (as noted under Policy NE3 Natural Heritage)*"

Summary of responses (including reasons) by planning authority:

The Council are aware the Strategic Environment Assessment and Habitat Regulations Appraisal (CDXX) do not form part of the Local Development Plan, therefore detailed comments regarding their content are outwith the scope of the Examination, except where those comments impact directly on an Unresolved Issue that has been raised in respect of the Plan itself.

Strategic Environmental Assessment

General Comments and Support

892, 896: Support with regards to relevant Plans, Policies and Strategies, the Strategic Flood Assessment (SFRA) and Table 5.3 is welcomed and noted.

Ancient Woodland

122: For the Opportunity Sites listed it is agreed that greater emphasis should be given to the presence of woodland on site and possible mitigation. This information will be included in the revised version of the Environmental Report (CD XX) and post adoption statement.

Anti-Social Behaviour

655, 656, 710: The Strategic Environmental Assessment is not required to assess or mitigate for anti-social behaviour. Such design issues are dealt with at the planning application/masterplanning stage where policies such as D1 – Quality Placemaking are applied to ensure that developments are safe and pleasant.

Landscape

886: Site B0933 Cadgerford was assessed both through the Development Options Assessment Report (CDXX) and the Strategic Environmental Assessment (CDXX). Both assessments found the site to be unrelated to the settlement of Westhill. The Council are satisfied that this assessment is correct. Each site is considered on its own merits, not alongside future development that may or may not happen in the neighbouring Local Authority area of Aberdeenshire.

Post Mitigation

1163, 1168: It is not clear what aspect of the Strategic Environmental Assessment's post mitigation is superficial. The Council are content that appropriate mitigation is discussed

within the Strategic Environmental Assessment for sites OP53, OP112, OP113, B0901, B0905, B0911 and B0927.

OP56 St.Fittick's Park and OP61 Doonies

888, 892, 896: It is agreed that greater emphasis should be given to the presence of the East Tullos Burn and its associated environmental benefits within the Strategic Environmental Assessment for OP56 and Policy B5. This information will be included in the revised version of the Environmental Report (CDXX) and post adoption statement.

752, 896: It is agreed that the Strategic Environmental Assessment should be amended for OP56 and OP61 so that it fully assesses the Energy Transition Zone in terms of its impact on the historic environment. This information will be included in the revised version of the Environmental Report and post adoption statement.

1020: The suggestions put forward to include information on OP56 as a public park, the East Tullos Burn project, contaminated land and strong odours will be incorporated into the revised version of the Environmental Report (CD XX) and post adoption statement.

OP46 Royal Devenick Park

888, 896: Agreement that OP46 will have a negative impact on the landscape setting of the area is noted.

OP53 Tillyoch

888, 896: Please see Issue 11 for a detailed response regarding woodland within OP53 Tillyoch. The Strategic Environmental Assessment for OP53 discusses woodland and protected trees on site.

OP85 King Street/Beach Esplanade

1146: The Council agree that there are discrepancies between the Strategic Environmental Assessment that was carried out for OP85 King Street/Beach Esplanade in the extant Local Development Plan 2017 (CD XX) and the Proposed Local Development Plan. The Council will re-assess OP85 in terms of its Strategic Environmental Assessment and any changes will be incorporated into the revised version of the Environmental Report and post adoption statement.

Water Abstraction

888, 896: The Council welcomes that water abstraction has been dealt with satisfactorily within Section 6.1.1 Water abstraction impacts on the qualifying interests of the River Dee Special Area of Conservation of the Habitats Regulations Appraisal. For clarity, the Council will amend the wording of page 46 of the Strategic Environmental Assessment to better reflect the position as suggested by respondents 888 and 896. This will be incorporated into the revised version of the Environmental Report (CD XX) and post adoption statement.

The word changes suggested for the section 'Note on the Assessment of Water', will also be made and incorporated into the revised version of the Environmental Report (CDXX) and post adoption statement so that the text reads, "*Decisions regarding acceptable water*

abstraction levels from the River Dee may be discussed between Scottish Environment Protection Agency (SEPA), Scottish Water and SNH. The Habitats Regulations Assessment also has a bearing on this issue. The licence for abstraction for the public water supply from the River Dee is held by Scottish Water, and SEPA is the principal regulator of that abstraction licence."

888, 896: The word changes suggested for other entries in the Environmental Report will also be made and incorporated into the revised version of the Environmental Report (CD XX) and post adoption statement so that the text reads, "*New development may increase the need for Scottish Water to abstract water from the River Dee for the public supply, with water abstraction licence requirements set by SEPA.*"

Habitats Regulations Appraisal

General Comments and Support

888: Support for the conclusion of 'no adverse effect' on site integrity in relation to loss of foraging habitat for Special Protection Area geese, on the integrity of the River Dee Special Area of Conservation in relation to construction pollution impacts, on site integrity of the following qualifying interests: Eider (non-breeding) as a qualifying interest of Ythan Estuary, Sands of Forvie and Meikle Loch Special Protection Area Bottlenose dolphin as a qualifying interest of Moray Firth Special Area of Conservation. Grey seal as a qualifying interest of Isle of May Special Area of Conservation is welcomed and noted.

888: Comment stating that "*unless any 'windfall' development sites are concentrated near particular Special Protection Areas, or unless the goose population trends change markedly, it would be appropriate to wait to consider this issue again through the next Local Development Plan cycle (i.e. rather than carrying out re-appraisal for each proposed windfall development).*" is also welcomed and noted.

888: Comment stating that the Council can conclude no adverse effect on the integrity of Special Protection Areas from increased recreational pressure is also welcomed and noted. The Council will include this within the update to their Habitats Regulations Appraisal Record.

888: Comment agreeing that based on the Habitats Regulations Appraisal's reasoning, the Council can conclude that the Proposed Local Development Plan will not have an adverse effect on the integrity of the River Dee Special Area of Conservation in relation to water abstraction is welcomed and noted.

888: Comment advising that provided the City and Shire Councils take steps to implement the means of ensuring that the level of windfall development does not exceed the identified headroom, there is unlikely to be a need to consider the abstraction issue afresh (via project level Habitats Regulations Appraisal) for each windfall application is welcomed and noted.

888: The word changes proposed in relation to Proposed Policy NE3 are discussed in Issue 21 Our Natural Heritage where the Council suggest to the Reporter that if they are so minded the Council would agree to the changes.

River Dee Special Area of Conservation During Construction

888: The Council agree that the word changes to the first three paragraphs on page 135 of the Habitats Regulations Appraisal record would make it clearer that the Council will take a detailed look at the risk associated with proposals at the project stage and then assess whether there is 'likely to be a significant effect' on the interests of the Special Area of Conservation. The Council will include this within the update to their Habitats Regulations Appraisal Record.

Word Change on Page 136

888: The Council agree that changing the acronym 'HRA' to 'Appropriate Assessment' on page 136 in the following sentence, "*if future development projects were considered likely to cause a likely significant effect, then at that stage project level HRA would be required as a legislative requirement (as noted under Policy NE3 Natural Heritage)*" would be clearer. The Council will include this within the update to their Habitats Regulations Appraisal Record.

Specific Comments related to Appendix 2

896: The amendments to the 'Other Factors' section of Appendix 2 and the table contained within the Environmental Report (CD XX) are discussed within Issue 41 (Appendix 2) where the Council suggest to the Reporter that if they are so minded the Council could make these changes.

Reporter's conclusions:

Reporter's recommendations:

Issue 40	MISCELLANEOUS	
Development plan reference:	No reference in Plan	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Susan Robertson (34) Sharon Leslie (65) Liz Howarth (100) Suzanne Kelly (150) James McKay (157) Carran Legge (204) Kieren Will (214) William Smith (218) Angela Bavidge (234) William Loxton (539) Cults, Bieldside and Milltimber Community Council (833) Lorcan O'Connor (842) Castlehill and Pittodrie Community Council (843) Cove and Altens Community Council (854) NHS Grampian (882) NatureScot (888) Scottish Government (896) Homes for Scotland (897) HFD Group Ltd (905) Colin McFadyen (924) Queens Cross / Harlaw Community Council (932) Lynne Nicol (1042) Patryk Dadura (1089) Torry Heritage Group (1099) HFD Group Ltd (1145) The New Aberdeen Mosque and Community Centre Project (1146) Carol Sinclair (1164) Victoria Davidson (1166)</p>		
Provision of the development plan to which the issue relates:		
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p>1164, 1166: Support the Proposed Local Development Plan.</p> <p><u>Consultation</u></p>		

Support

897: Welcomes the additional time made available to respond to the Proposed Local Development Plan.

842: Thanks given to Local Development Plan Officers for correspondence received during lockdown.

854: Welcomed the digital presentation on the Proposed Local Development Plan given to them by Local Development Plan officers.

Insufficient/problematic consultation

34, 65: It is difficult to respond to a consultation during COVID pandemic and queries why it took place during this time.

34, 65: Online consultation poses difficulties for older members of the community.

100: COVID pandemic means consultation activities are not possible. Council should consider alternative ways to consult that are not online or put it on hold. Consultation process is questioned and feels that there has been a limited almost evasive level of consultation.

100: Queries whether the consultation process has been equality impact assessed and to view this. Concern that the consultation was not fair or equitable.

539: Website difficult to navigate and some people have no access to internet. An outdoor public consultation should be held with COVID precautions. Extend consultation process beyond Aberdeen City Council website and hold outdoor consultations e.g. Tesco car park at Wellington Road.

854: Publishing digitally and not in hard copy has been difficult to work through the information and documentation related to the consultation on the Proposed Local Development Plan.

1099: There has been a lack of information and consultation on the Proposed Local Development Plan. Proposed Local Development Plan should be delayed until the economic impacts of COVID are better understood.

150: There is no Torry Community Council to represent the public, and a Councillor with a criminal record.

157: Consultation only undertaken because of legal obligation and responses will be ignored. Dislike expressed for the Council Administration.

842: More engagement is required to discuss complex issue surrounding the Bon Accord Resident Association Area.

924: Views of communities have been ignored or misinterpreted.

833: Frustrated that Aberdeen City Council have put forward development proposals for unused land without consulting the Community Council on potential community uses. Notes one proposal (B0919) which failed the selection criteria.

Format of documents

100: Request easy read versions of the documents.

1099: Plan is poorly structured, hard to negotiate with limited detail on the proposals.

Neighbour Notification

234: Neighbour notification needs to extend beyond a 20 metre boundary for large sites which have an impact on a large number of people. Confusing that neighbour notification received for 10 houses when 30 houses had been approved.

924: Not heard about plans to develop these areas until the neighbour notification was received.

Equalities Assessment

100: Queries if the Proposed Local Development Plan has undergone an equalities assessment and to view this.

Delivery Programme

882: Supports that the Delivery Programme will be regularly updated and wishes for flexibility to be considered in considerations in relation to health care provision.

1146: Delivery Programme - Appendix 1 - 4 - Other Opportunity Sites - OP85: Text in the notes box refers to 'interested parties', this does not reflect the position as there is only one party. Text should be amended.

888, 896: Respondent highlights that the Environmental Report makes frequent reference to ecological survey work in the "Mitigation if appropriate" column of the site assessments. The requirement for such survey is not very frequently represented within the Delivery Programme. Recognising that the Delivery Programme is to be a working document that can be continually updated, the respondent recommends that where a requirement for survey is expressed in the Environmental Report it is also transposed into the Delivery Programme.

Local Place Plans

833: With reference to paragraph 2.8 - Given the 10 year timescale of this Local Development Plan, respondent is surprised that no mention of Local Place Plans are made or how they will relate to the Local Development Plan as defined by Planning (Scotland) Act 2019. Scottish Government guidance on Local Place Plans is still awaited

but adopted Aberdeen Local Development Plan 2022 should acknowledge that Local Place Plans will begin to impact on the planning process over the Local Development Plan period.

843: Conversations to date on Local Place Plans have been very constructive and positively received. Further work is required to understand the best methods of delivering the identified priorities and areas of focus from the Local Development Plan. The Community Council can serve as a key link and partner in the formation of plans.

New Policy

905, 1145: Promotes inclusion of an additional criteria based policy to address alternative use proposals brought forward on brownfield sites (including allocated or existing employment sites) throughout the Plan period in line with objectives to secure growth. Would allow for greater flexibility of uses at land. Policy wording provided as modification.

Other

843: Fittie / Footdee - Fully support the continued conservation status for Fittie / Footdee, including the grant source funding, and successful asset transfer request of Fittie Community Hall.

932: Core Path - Comments relating on how to improve Core Path 96, Core Path 60 and Core Path 65. Until the Core Paths are improved they should not be marked up on the Local Development Plan maps. Core Paths should be categorised.

Blank Representations

204, 214, 218, 1042, 1089: No comments provided.

Modifications sought by those submitting representations:

Consultation

157: Head of Council Administration should resign.

Delivery Programme

1146: Amend notes section to read: "*The New Aberdeen Mosque and Community Centre; Negotiations with the interested party are at an advanced stage.*"

Local Place Plans

833: Acknowledgement of Local Place Plans in Local Development Plan.

New Policy

905, 1145: Include an additional criteria based policy (Policy B1A):

“Proposed Policy B1A - Alternative Uses in Business and Industrial Areas.

In principle, we will support development proposals for mixed use (including housing, leisure, retail, hotel development) on land allocated as business and industrial land, where: - The proposal would lead to the redevelopment of a brownfield site; - The proposal would support the regeneration of vacant and derelict land through its sustainable and productive re-use; - The re-use of the land would not prejudice the operation of any adjoining businesses; - The development is of an appropriate design and scale; - The proposal would not have an adverse impact on the quantity or quality of marketable employment land in Aberdeen City when assessed against the requirements of the SDP.”

Summary of responses (including reasons) by planning authority:

Support

1164, 1166: Support is noted and welcomed.

Consultation

Support

842, 854, 897: Support is noted and welcomed.

Insufficient/problematic consultation

34, 65, 100, 150, 157, 539, 833, 842, 854, 924, 1099: The Coronavirus (Scotland) Act 2020 (CDXX) required the Council to consider whether any of its actions would be likely to impede its ability to take effective action to prevent, protect against, delay or otherwise control the incidence or transmission of coronavirus. This required the Council to promote the national policy of social/physical distancing. A national lockdown commenced in Scotland on 23 March 2020. The lockdown required the closure of all Council offices, libraries and for staff to work remotely. Aberdeen City began its first phased exit from lockdown on 28 May 2020. The second phase of exiting lockdown commenced on 18 June 2020 and the third phase began on 9 July 2020. During all three phases it was advised the Council offices and libraries remain closed and that staff work remotely.

On 3 April 2020, Scotland’s Chief Planner John McNairney issued a letter (CDXX) which set out how Local Authorities should undertake their responsibilities in response to the pandemic. This letter outlined the provisions which allowed the publication of the Proposed Local Development Plan online in lieu of the requirement to make them available for physical inspection. Subsequent advice (CDXX) was issued in May 2020 by the Scottish Government and outlined additional expectations with regards to engagement including extending consultation periods, newspaper articles, increased contact with

Community Councils and online meetings. In order to compensate for the disruption caused by the pandemic, the consultation period for the Proposed Local Development Plan was extended to over 14.5 weeks between 20 May 2020 – 31 August 2020. Whilst the possibility of undertaking face-to-face engagements events was considered during the consultation period, Scotland remained in phase three and a local lockdown in Aberdeen commenced in August 2020. Online meetings were instead offered to stakeholder groups and conducted online with a focused presentation and question-and-answer session.

An advice note (CDXX) was published on the Council's website in order to clearly explain to the public how they could make a representation and what would happen if they did submit a representation on the Proposed Local Development Plan. A specific Consultation Portal was also available for the public to use throughout the consultation period to make electronic submissions on the Proposed Local Development Plan. Hard copy submissions could also be submitted via post to the Council's offices. In the absence of physical consultation events a StoryMap tool was also developed to make our online material easier to understand. Newsletters were published, public notices were placed in two newspapers, existing interested parties were notified by email, over 10 online meetings were held with Community Councils and other groups in addition to other social media posts on Twitter, LinkedIn and Facebook.

The level of response to the Proposed Local Development Plan consultation was a significant increase compared to the consultation on the extant Local Development Plan 2017 (CDXX) with over 1000 more comments received. Noting the above, the Local Development Plan Team made considerable efforts to engage, over and above the statutory requirement, during a difficult period of national and local lockdowns. Section 16 of the Town and Country Planning (Scotland) Act 1997 (CDXX), as amended requires planning authorities to replace their Local Development Plan within 5 years of the previous plans adoption. The extant Local Development Plan 2017 (CDXX) was adopted on 20 January 2017 and therefore, to meet the required 5 year timescale, consultation on the Proposed Local Development Plan could not be delayed.

Format of documents

100: The Proposed Local Development Plan, although a technical land use planning document, has been written in plain language where possible with Glossary definitions provided to assist with understanding. The Local Development Plan Team remained contactable by email and phone throughout the consultation period to discuss any particular queries.

100, 1099: As noted above the StoryMap tool was developed to assist with community engagement in the absence of events. The story map offered an overview of the Proposed Local Development Plan and all map related policies. It included a search by address function so that those interested could ascertain what proposals and or policies would be relevant to their address. The Storymap also linked by topic to additional supporting documentation to allow ease of navigation.

1099: The level of detail in the Proposed Local Development Plan is appropriate with more detailed policy aspects to be contained in Aberdeen Planning Guidance. Further detail on proposals will become available as the Opportunity Sites (OPs) progress through the Delivery Programme, masterplanning and planning application processes. The Local Development Plan is not intended to provide detailed information on each proposal but be

concise, succinct and map-based as per Planning Circular 6/2013: Development Planning (CDXX).

Neighbour Notification

234, 924: As required under Section 14 of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008 (CDXX) the Council is required to notify all addresses within 20 meters of any allocated site or specific proposal. The Proposed Local Development Plan includes 111 Opportunity Sites (OPs) and 2 areas of Land For Transport with specific proposals (Berryden and South College Street). Over 17,000 letters of notification were sent for these sites. All letters which were sent allowed for at least a 6 week period to respond to the consultation. The Council also utilised social media, newsletters and press releases to regularly publicise the Proposed Local Development Plan consultation period.

234: See Issue 11: Allocated Sites and General Area Strategy: Deeside where it is confirmed that a site (OP112) with an extant allocation in the Local Development Plan 2017 was granted planning permission for a higher number of units than the allocation. Neighbour notification for development planning is a different process to neighbour notification for development management.

Equalities Assessment

100: The Town and Country Planning (Scotland) Act 1997 (CDXX), as amended requires us to encourage equal opportunities. As part of our commitment to this, the Development Plan Scheme - Participation Statement (CDXX) required us to carry out an Equalities and Human Rights Impact Assessment of the Proposed Local Development Plan. The Equalities Assessment is available on request from the Equalities Team via equality_and_diversity@aberdeencity.gov.uk

Delivery Programme

882, 888, 896, 1146: Comments on the Delivery Programme are outwith the scope of the Examination but will be considered as part of its review in due course.

882: Support for regular updating of the Delivery Programme is noted and welcomed. The Delivery Programme is a working document, updated regularly and formally published every 2 years. It aims to reflect the continuous progress of implementation of the Local Development Plan. It can be utilised to reflect updates during delivery of proposals and can be updated independently of the formal Local Development Plan review. No change to the Proposed Local Development Plan is required.

1146: Comment noted. No change to Proposed Local Development Plan required.

888, 896: We acknowledge that it would be sensible to reflect mitigation measures detailed in the Environmental Report in the Delivery Programme and will consider these in due course. No change to Proposed Local Development Plan required.

Local Place Plans

833, 843: The Proposed Local Development Plan was prepared under the current legislation. Local Place Plans form part of the new development planning system - the Planning (Scotland) Act 2019 (CDXX) - passed by Scottish Parliament in 2019. The provisions in the 2019 Act regarding Local Place Plans are not yet in force and the timing of their commencement will be linked to coming into force of secondary legislation and regulations following consultations ongoing at the time of writing. These are not due to be in place until the end of 2021. The next iteration of the Local Development Plan is best placed to cover Local Place Plans. No change to Proposed Local Development Plan required.

New Policy

905, 1145: Issue 37- Policies B1, B2, B3: Supporting Business and Industry, Airport addresses similar requests to modify existing policy to address alternative proposals brought forward on land identified with a business or industrial zoning. The same response is applicable to the creation of a new policy relating to alternative uses on brownfield land identified with a business or industrial zoning. There is sufficient flexibility within existing policy to allow additional uses in locations zoned as B1 and B2 where appropriate. The Local Development Plan review process includes consideration of existing business and industrial allocations and whether they are still fit for purpose. Whilst there is support for redevelopment of brownfield sites the Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) requires the Proposed Local Development Plan to maintain and safeguard a ready supply of at least 60 hectares of marketable employment land in suitable locations. In addition, at least 20 hectares of this marketable land should be of a standard which will attract high quality businesses. The Proposed Local Development Plan intends to maintain this supply. The Proposed Local Development Plan zones land for residential, retail and mixed uses already. Proposals for non-business/industrial uses would be more appropriate in these areas. Any proposal for an alternative use on a brownfield site would be considered on a case by case basis assessed against relevant policies in the Local Development Plan. An additional criteria-based policy to consider alternative uses on brownfield sites identified within a business or industrial zoning is not considered necessary and would likely not comply with the intention to maintain the supply of employment land per Aberdeen City and Shire Strategic Development Plan 2020 (CDXX) requirement.

Other

843: Support is noted and welcomed. Footdee is identified as within a Conservation Area.

932: The Proposed Local Development Plan maps and safeguards the network of core paths which are defined within the Council's Core Paths Plan (CDXX). A Local Development Plan is not the appropriate place to categorise Core Paths as this matter is not one that should be dealt with within planning policy. The Council's 'Core Paths Plan' website page specifies that the paths can be made up of many types of path ranging from natural ground to high specification constructed paths. Further descriptions of each path are provided from this website page and contact details are available for the relevant Team where comments on individual paths can be submitted. No change is required.

Blank Representations

204, 214, 218, 1042, 1089: There is no issue to resolve as no comments provided.

Reporter's conclusions:

Reporter's recommendations:

Issue 41	GLOSSARY AND APPENDICES 1- 5	
Development plan reference:	Pages 102 - 125	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Hilary Leigh (576) Stewart Milne Homes (717) Shell UK Limited (730) LSREF3 Tiger Aberdeen S.À.R.L. (C/o Ellandi LLP) (855) Drum Property Group (859) NatureScot (888) Scottish Environment Protection Agency (892) Aberdeen Harbour Board (910) Queens Cross / Harlaw Community Council (932) Aberdeen Football Club Plc (944) The New Aberdeen Mosque and Community Centre Project (1146)</p>		
Provision of the development plan to which the issue relates:	Glossary and list of Brownfield Sites, list of Opportunity Sites, list of Masterplans and Aberdeen Planning Guidance and list of Council Owned Land	
Planning authority's summary of the representation(s):		
<p>Glossary</p> <p><u>Changes to Content</u></p> <p>855: The respondent has concerns with regards the proposed Glossary definitions for Regional Centre (City Centre) including Retail Core, Retail Warehouses, Sequential Approach and Town Centre and seeks changes to how these elements are defined.</p> <p>932: The respondent is seeking a definition for Core Paths in the Glossary. Definition would outline that they must be signposted, well managed, easy to find and follow and include clear waymarking.</p> <p>Appendix 2</p> <p><u>Changes to Wording or Layout</u></p> <p>730: The respondent supports references to the Pipeline Notification Zones in Appendix 2 for OP23, OP63, OP34 and OP44 and that no new or amended allocations are proposed which have the potential to adversely affect the existing pipelines. For clarity and consistency specific reference to Policy B6 is sought for all of the above sites with wording as has been set out for OP44.</p>		

888: The respondent welcomes inclusion of wording in the final column of Appendix 2 about the need for Habitats Regulations Appraisal for those Opportunity Sites that are located in the catchment of the River Dee Special Area of Conservation (SAC) however, the respondent suggests some minor word changes to the standard wording that is used for these allocations.

888: The respondent recommends replacing all current references to “Natura site” (or Natura sites) with “European site” (or European sites). Following the UK withdrawal from the European Union, Special Areas of Conservation and Special Protection Areas are still of international/European importance and are still referred to as European sites.

888: For relevant allocations listed in the Masterplan Zones table at paragraph 11.7, the respondent recommends that these sites should also be referenced as Masterplan Zones under Appendix 2 while also stating whether a masterplan is required or has already been prepared or approved and if so the date of approval.

888: The respondent considers that it would be helpful to have an additional column in Appendix 2 which explicitly refers to design tool requirements. This should include the existence of agreed design tools.

Changes to Content

717: Under Appendix 2, OP38 Countesswells, the respondent is seeking the removal of the reference for a requirement for a Flood Risk Assessment and removal of references to flooding as a Flood Risk Assessment has already been submitted as part of a Planning Permission in Principle application and an Environmental Impact Assessment and the site was found not at risk of flooding. A Habitats Regulations Appraisal was carried out as part of the Environmental Impact Assessment and the Construction Environmental Management Plan has been approved by Aberdeen City Council in consultation with Scottish Environment Protection Agency. These references should also be deleted.

859: Under Appendix 2, the respondent has requested changes to the content for site OP29 to allow ‘appropriate or complimentary uses’ other than class 4 and a requirement for an updated Development Framework covering OP29 and OP63. It is requested that the requirement for a Habitats Regulation Appraisal is removed for both OP29 and OP63.

859: The respondent sets out justification for an amendment to the description of site OP63 in Appendix 2 in order for the use of the site to be more flexible. The respondent also disputes the need for a Habitats Regulation Appraisal of development on these sites due to their distance from the River Dee Special Area of Conservation.

888: The respondent makes comments with regards the content of the following sites within Appendix 2; OP3, OP7, OP10, OP12, OP14, OP23, OP37, OP46, OP49, OP53, OP54, OP56, OP62, OP65, OP66, OP87, OP93, OP113 and OP116. For OP14, wording sought to include reference to enhancement and specific reference to Green Space Network, woodland and trees. For OP46, wording sought to stipulate that the developable area is to be confined to parts of site to the east of the Burn of Leggart and include reference to the requirement for a Habitats Regulations Appraisal and a Construction Environmental Management Plan. Further recommendations for OP46 relate to the protection of Ancient Woodland as part of the Local Nature Conservation Site and a recommendation for new planting to reduce visual impacts. For OP53, the removal of the northern section to reduce visual impacts and the removal of the south east of the site

overlapping with Ancient Woodland is advised and a reference to the requirement for a Habitats Regulations Appraisal and a Construction Environmental Management Plan is sought. Further recommendations for OP53 relate to the protection of Ancient Woodland as part of the local Conservation Site. The removal of OP54 is sought. For OP56, wording sought to stipulate that development must avoid impacts upon the East Tullos Burn and associated wetland, wildflower and tree planting areas. For OP116, reference to the requirement for a Habitats Regulations Appraisal and a Construction Environmental Management Plan is sought.

888, 892: The respondents recommend adding a reference to a requirement for a masterplan within the text of Appendix 2 for the following sites; OP3, OP7, OP10, OP12, OP18, OP23, OP37, OP46, OP53, OP58, OP59, OP66, OP70, OP87, OP93, OP99, OP100 and OP113. For sites OP59 and OP70 a Development Framework is sought. A Masterplan or Development Brief is recommended for OP65. A Planning Brief and Masterplan is required for OP14. A Development Brief is recommended for OP49 and OP56. If OP54 is to be retained, then a Masterplan is recommended. Sites which require a Masterplan may also need to be added to Appendix 3. Reasons for requiring a Masterplan are set out within the responses.

892: With regards Appendix 2, the respondent objects unless text is added relating to the requirement for a Flood Risk Assessment for the following sites; OP3, OP6, OP11, OP12, OP17, OP20, OP21, OP22, OP29, OP40, OP61, OP65, OP75, OP95, OP100, OP106, OP112. For OP51, the respondent objects unless text is added which requires the respondent to demonstrate that the Culter Burn is protected. For sites OP47, OP49, OP50, OP53 and OP110 comments relate to the recommendation to set out the requirement or potential requirement for a Flood Risk Assessment. For sites OP52 and OP74 the respondent outlines that a Flood Risk Assessment would not be required. For sites OP3, OP7, OP66, OP81, OP91 and OP116 the respondent states that a Drainage Impact Assessment is required.

892: With regards Appendix 2, the respondent objects to the inclusion of OP56 and it does not consider the site assessment in the Strategic Environmental Assessment to be satisfactory.

944: The respondent states that for Appendix 2 OP30 reference to a Habitats Appraisal and Construction Management Plan should be removed as these have been met via the conditions in planning application 170021/DPP.

1146: For OP85 King Street/Beach Esplanade the wording of 'Other Factors' in Appendix 2 is unhelpful. Inclusion of "*or if a decision is made not to pursue them*" is unhelpful. Wording should be amended.

Comments Noting Content or Seeking Clarification

888: The respondent notes that the boundary allocation of OP62 has not changed in comparison to the extant Local Development Plan 2017 however there is the addition of two sites for the Energy Transition Zone. It is noted that OP62 includes the Nigg Bay Site of Special Scientific Interest (SSSI) which is of national importance for geological deposits (protected through the extant consents for the harbour expansion development). It is understood that there would be no change to the harbour expansion under the Proposed

Local Development Plan and therefore there would be no adverse impacts to the Site of Special Scientific Interest.

892: The respondent requests clarification regarding OP51 as to whether the site is covered by a Planning Brief or a Masterplan. Also, a query as to whether OP19 is part of the approved Newhills Development Framework.

892: For site OP62 the respondent notes that there are requirements in the existing planning permission which will need to be incorporated into any Masterplan, including areas of restoration.

Appendix 3

Changes to Content

888: Appendix 3 should include a "shelf life" for Masterplans so that they can be reviewed.

888, 892: Amendments sought to Appendix 3 in lines with issues raised by respondents in Appendix 2, specifically the inclusion of listed sites as Masterplan sites.

910: The respondent believes that the Aberdeen Harbour Board Masterplan 2020 should be included as one of the Proposed Local Development Plan's associated documents alongside the Nigg Development Framework and the Energy Transition Zone Feasibility Assessment.

Appendix 5

Comments Seeking Clarification

576: The respondent questions whether the car park to south of the tennis club is owned by Scottish Water and not Aberdeen City Council as set out in Appendix 5.

Modifications sought by those submitting representations:

Glossary

855: Within the Glossary, make changes to the definition of the following: Regional Centre (City Centre) including Retail Core to be defined as *The central area of Aberdeen (as defined on the Proposals Map) which provides a broad range of facilities and services that serve a citywide or regional market.* Retail Warehouses to be defined as *Large single level stores, sometimes with a mezzanine floor, specialising in the sale of predominantly 'bulky goods' such as carpets, furniture, large electrical goods, DIY and larger leisure goods, catering mainly for car borne customers and often in out-of-centre locations.* For Sequential Approach it is suggested to include additional text at the beginning; *The sequential approach to development seeks to ensure that retail and other land uses which generate significant levels of footfall are developed in town centres in the first instance.* The word shopping is suggested for removal under this section. Town Centre is to be defined as *The central area of a town (as defined on the Proposals Map) which provides a*

broad range of facilities and services that serve the town but not a citywide or regional market.

932: The respondent seeks the addition of Core Path to the Glossary and sets out the definition which is sought to include the following; Signposting, be well managed, easy to find and follow, clear waymarking.

Appendix 2

Changes to Wording or Layout

730: For Pipeline Notification Zones for sites OP23, OP34 and OP63, additional wording should be included to match that of OP44, making specific reference to Policy B6. The amended wording should read; The site lies within a pipeline consultation zone and all development should confirm to the terms of Policy B6 – Pipelines, Major Hazards and Explosives Storage Sites.

888: Changes to wording for sites which are located within the catchment of the River Dee Special Area of Conservation (SAC) and which require a Habitats Regulations Appraisal. The following changes to text are sought; The development will be subject to a Habitats Regulations Appraisal (HRA) in order to avoid adverse effects consider potential effects on the qualifying interests of the River Dee special Area of Conservation. As part of this process it is likely an adequate Construction Environmental Management Plan (CEMP) will also be required, although it is possible that this could be subject to planning conditions.

888: Change all references of Natura site(s) instead to European site(s).

888: Sites which are listed in the Masterplan Zones table at paragraph 11.7 should be referenced as Masterplan Zones in Appendix 2 while also stating whether a Masterplan is required or has already been prepared or approved and if so the date of approval.

888: Create an additional column which explicitly refers to design tool requirements or the existence (and date) of agreed design tools (Development Frameworks, Masterplans or Planning Briefs).

Changes to Content

717: For OP38, remove the following text; *Site may be at risk of flooding. Flood Risk Assessment required to accompany future development proposals. A Habitats Regulations Appraisal is required to accompany development proposals in order to void adverse effects on the qualifying interests of the River Dee Special Area of Conservation. As part of this process it is likely a Construction Environmental Management Plan will also be required.*

859: Under Appendix 2, for OP29, add text; *...and other uses considered appropriate or complimentary. Non-Class 4 Business uses will be required to maintain the quality of the development in line with the principles set out in the Development Framework. An updated Development Framework should be prepared covering OP29 and OP63 examining the types of complementary uses considered appropriate.* Also remove the text requiring a Habitats Regulations Appraisal. For OP63, remove text stating masterplan approved and

text referring to need for Habitats Regulations Appraisal. Add text; *An updated Framework should be prepared covering OP29 and OP63.*

888: OP3, at end of text add; *Masterplan required.* OP7, at end of text add; *Masterplan required.*

888: OP10, add text; *...Dubford Development Framework. Masterplan required. This site may be....* OP12, at end of text add; *Masterplan required.*

888: OP14, add text; *...Development should avoid harmful impacts on and seek to enhance the Green Space Network, woodland, trees and community orchard. A Flood Risk Assessment is required. A Planning Brief is likely to be required to inform the Masterplan. Masterplan required.*

888: OP23, at end of text add; *Masterplan required.*

888: OP46, changes to text; *Housing opportunity for 150 houses. Masterplan required. The developable area will be confined to that part of the site which lies to the east of the burn of Leggart. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee Special Area of Conservation. As part of this process it is likely a Construction Environmental Management Plan will also be required. The development proposal will be subject to a Habitats Regulations Appraisal (HRA) in order to consider potential effects on the qualifying interests of the River Dee Special Area of Conservation. As part of this process an adequate Construction Environmental Management Plan (CEMP) may be required, although it is possible that this could be made subject to planning conditions. The site contains woodland which is included in the Ancient Woodland Inventory and forms part of the Den of Leggart Local Nature Conservation Site . This woodland will be protected in compliance with Scottish Planning Policy, Policy NE2 Green and Blue Infrastructure, Policy NE3 Our Natural Heritage, and NE5 Trees and Woodland. Information will be required to demonstrate how the Ancient Woodland interest will be protected during both construction and operation. New planting extending south from the Den of Leggart woodland (to the southern extent of the allocation) is required to reduce visual impacts and should be in keeping with the existing woodland.*

888: OP53, changes to text; *Housing opportunity for 250 houses. Flood Risk Assessment required. A Habitats Regulations Appraisal is required to accompany development proposals in order to avoid adverse effects on the qualifying interests of the River Dee Special Area of Conservation. As part of this process it is likely a Construction Environmental Management Plan will also be required. The development proposal will be subject to a Habitats Regulations Appraisal (HRA) in order to consider potential effects on the qualifying interests of the River Dee Special Area of Conservation. As part of this process an adequate Construction Environmental Management Plan (CEMP) may be required, although it is possible that this could be made subject to planning conditions. The south east of OP53 comprises woodland which is included in the Ancient Woodland Inventory and forms part of the Peterculter Local Nature Conservation Site. This woodland will be retained as part of the Green Space Network, and requires to be protected in compliance with Scottish Planning Policy, Policy NE2 Green and Blue Infrastructure, Policy NE3 Our Natural Heritage, and NE5 Trees and Woodland. A masterplan will be required setting out, amongst other things, how ecological connections between the various parcels of woodland around the site will be maintained. Information will be*

required to demonstrate how all woodland interest on and surrounding the site will be protected and enhanced during both construction and operation.

888: OP56, prior to the last sentence of text add; *Development must retain the amenity value of and avoid any adverse impacts upon the East Tullos Burn and its associated wetland, and areas of wildflower and tree planting. The Council will produce a Planning Brief to guide development at OP56. A key part of this will be a map illustrating the areas of constraint, the main developable areas, and other relevant aspects of the Council's Vision for the site. This Planning Brief will help inform the Joint Masterplan needed for OP56, OP61 and OP62.*

888: OP116, at end of text add; *The development proposal will be subject to a Habitats Regulations Appraisal (HRA) in order to consider potential effects on the qualifying interests of the River Dee Special Area of Conservation. As part of this process an adequate Construction Environmental Management Plan (CEMP) may be required, although it is possible that this could be made subject to planning conditions.*

892: Additional text is sought relating to the requirement for a Flood Risk Assessment for the following sites; OP3, OP6, OP11, OP12, OP17, OP20, OP21, OP22, OP29, OP40, OP47, OP49, OP50, OP53, OP61, OP65, OP75, OP95, OP100, OP106, OP110, OP112. For OP51, additional text is sought requiring demonstration that the Culter Burn is protected. Additional text is sought to require a Drainage Impact Assessment for sites OP3, OP7, OP66, OP81, OP91 and OP116.

888: Remove OP54 from the Proposed Local Development Plan.

892: Remove OP56 from the Proposed Local Development Plan.

892: Remove the requirement for a Flood Risk Assessment for OP52 and OP74.

888, 892: Additional unspecified text is sought relating to the requirement for the following sites to be added to the list of masterplans; OP18, OP37, OP53, OP58, OP59, OP66, OP70, OP87, OP93, OP99, OP100 and OP113. Inclusion of unspecified text sought for requirement for Masterplan and or Planning Brief for OP65. With regards OP54, if retained include requirement for masterplan within text. With regards OP49, possible inclusion of requirement for a Planning Brief. Additional text is sought to require a Development Framework for OP59 and OP70.

944: Remove reference to Habitats Appraisal and Construction Management Plan for OP30.

859: The respondent sets out justification for an amendment to the description of site OP63 in appendix 2 in order for the use of the site to be more flexible. The respondent also disputes the need for a Habitats Regulations Appraisal of development on these sites due to their distance from the River Dee Special Area of Conservation.

1146: Amend 'Other Factors' of OP85 to read, "*Site is identified by Council resolution for a Mosque, Community facilities and open space. Until proposals for these uses are progressed the existing open space use will be protected by Policy NE2 Green and Blue Infrastructure (Urban Green Space).*"

Appendix 3

Changes to Content

888: Appendix 3 to include a "shelf life" for Masterplans so that they can be reviewed.

888, 892: Include all sites listed above which respondents want to see as listed masterplan sites in Appendix 3.

910: Include the Aberdeen Harbour Board Masterplan 2020 as an associated document alongside the Nigg Development Framework and the Energy Transition Zone Feasibility Assessment.

Summary of responses (including reasons) by planning authority:

Glossary

Changes to Content

855: For Regional Centre (City Centre) including Retail Core and Town Centre, the current Glossary explanations are considered sufficient. The location of both Centres are clearly set out on the City Wide Proposals Map which the reader should use in conjunction with the Glossary. For Retail Warehouses, the current Glossary explanation is considered sufficient. The inclusion of a mezzanine floor would not affect whether the store is considered to be single storey in height while all other minor amendments to the wording are deemed unnecessary and do not bring any additional clarity or conciseness to the definition. For Sequential Approach, the current Glossary explanation is considered sufficient. Policy VC9 – Out of Centre Proposals sets out the context with regards the application of a sequential approach against proposals which generate significant footfall and the desire for such proposed developments to ideally sit within defined centres. The explanation makes it clear than in the specific case of major shopping proposals the City Centre will assume primacy, this does not preclude other types of development being applied to the sequential approach methodology.

932: The Core Paths in Aberdeen are set out in the Core Paths Plan (CD XX) which is not a planning document. The definition of what constitutes a Core Path may be subject to change over the lifetime of the Local Development Plan and consequently it would not be advisable to set out a precise Glossary definition.

Appendix 2

Changes to Wording or Layout

730: Pipelines will continue to be protected through Proposed Local Development Plan Policy B6 and it is not considered necessary to add a specific reference to this Policy within the 'Other Factors' column in relation to the sites mentioned. Pipelines are already clearly marked on the Proposed Local Development Plan's Additional City Wide Proposals Map for consideration by Planning Officers, and therefore the need to consider Policy B6 is highlighted.

888: Support for the reference to the requirement for Habitats Regulations Appraisals for Opportunity Sites located in the catchment of the River Dee Special Area of Conservation (SAC) is noted and welcomed. The proposed changes to wording are relatively minor. For clarity purposes, if the Reporter is so minded, the proposed word changes can be adopted.

888: If the Reporter is so minded, the preferred term European site is noted and the reference will be changed to this from Natura site.

888: All aspects of the Local Development Plan should be considered in conjunction. It is not necessary to list each allocation referenced as a Masterplan Zone in the table under Appendix 2. Appendix 2 should not be considered an entirely exhaustive direction of itself, rather its aim is to set out the main points of consideration for each site.

888: There is limited room to include a third column listing details of required or existing design tools. Masterplans which have already been prepared and approved are set out in Appendix 3 while for other sites Masterplans have not yet come forward. As these circumstances would be everchanging throughout the life of the Local Development Plan it could be misleading to list the circumstances at the time of writing under Appendix 2. Appendix 2 is not an exhaustive direction of itself, rather its aim is to set out the main points of consideration for each site.

Changes to Content

717: Whilst the site history is acknowledged, this does not necessitate the removal of the requirement for a Flood Risk Assessment, references to flooding at the site nor the requirement for a Habitats Regulations Appraisal or a Construction Environmental Management Plan. Site constraints remain unchanged and should a separate application proposal come forward at the site then it would be necessary for any applicant to demonstrate that there would be no significant impacts in terms of flooding or habitats. It is more consistent to list all sites that require Flood Risk Assessment and Habitats Regulations Appraisal regardless of what stage they are at. The Council are required to list this information in order for the Habitats Regulations Appraisal to be complete.

859: Habitat Regulations Appraisals are required for sites OP29 and OP63. These sites have undergone Strategic Environmental Assessment (CDXX). The sites have not been entirely built out and any potential effects from proposed development upon the River Dee Special Area of Conservation must be properly assessed. With regards the other issues highlighted, refer to Issue 8: Alternative Sites Kingswells and Greenferns.

888: Additional text is sought for a number of allocated site references within Appendix 2. Appendix 2 should not be considered an entirely exhaustive direction of itself, rather its aim is to set out the main points of consideration for each site and it is to be read in conjunction with the relevant policies. Where wording is proposed to offer specific protection to waterways, green space network, open space, trees and woodland and Local Nature Conservation Sites, this is not deemed to be necessary as Policy NE2 – Green and Blue Infrastructure, Policy NE3 – Our Natural Heritage, Policy NE4 – Our Water Environment and Policy NE5 – Trees and Woodland are applicable and will be used to assess proposals. Where changes to the wording for the requirement for Habitat Regulations Appraisal and Construction Environmental Management Plan are sought, for clarity purposes if the Reporter is so minded, the proposed word changes could be adopted. For OP14, reference to a requirement for enhancement is also not considered

necessary as Policy NE2 sets out a requirement for enhancement. Each application will also be judged upon its compliance with Policy D1 – Quality Placemaking. For OP46, while assessment may prove that development at this site is only practical to the east of the Burn of Leggart, it is not necessary to be prescriptive in Appendix 2. Reference to further tree planting required for screening is not necessary within Appendix 2 as these matters are covered by Policy D4 – Landscape and Policy D1 – Quality Placemaking. For OP53, the removal of the north of the site to reduce visual impacts is not required. Visual impacts can be, to some extent, mitigated by good design and strategic planting as can be demonstrated through the application process. The removal of the part of the site which overlaps with trees within the Ancient Woodland is not necessary as this woodland is protected when Policy NE5 – Trees and Woodland and Policy NE3 – Our Natural Heritage are applied. The removal of OP54 is sought and the response to this is covered by Issue 11.

888, 892: OP18 outlines the requirement for a Masterplan. Masterplans are required for all residential sites of 50 or more houses and/or with an area in excess of 2 hectares as noted in Policy H4 – Housing Mix and Need. Sites OP7, OP10, OP12, OP37, OP46, OP53, OP58, OP59, OP66, OP87, OP93, OP99 and OP113 meet the above listed threshold for a Masterplan to be required and consequently any reference within Appendix 2 is unnecessary. OP70 and OP100 are City Centre Masterplan and Delivery Programme Intervention Areas listed under Appendix 3. OP3 is covered by the Murcar Development Framework 2012 (CD XX) while within site OP23 are the connected roadways of International Avenue, International Way and Wellheads Drive. Appendix 3 does not set out each site where a Masterplan would be required, rather it sets out a number of existing Masterplans for larger sites and new Masterplans and Development Frameworks which will also require to be adopted as non-statutory planning guidance.

892: If the Reporter is so minded, we will accept the inclusion within Appendix 2 for the following changes: Text setting out the requirement for Flood Risk Assessments for sites OP3, OP6, OP11, OP12, OP17, OP20, OP21, OP22, OP29, OP40, OP61, OP65, OP75, OP95, OP100, OP106 and OP112. Text requiring demonstration that the Culter Burn is protected for OP51. Text setting out the requirement or potential requirement for a Flood Risk Assessment for sites OP47, OP49, OP50, OP53 and OP110. Removal of text requiring Flood Risk Assessments for sites OP52 and OP74. Text requiring a Drainage Impact Assessment for sites OP3, OP7, OP66, OP81, OP91 and OP116.

892: It is accepted that the Strategic Environmental Assessment (CDXX) for OP56 does not cover every pertinent issue and so it will be revisited. This information will be included in the revised version of the Environmental Report and post adoption statement.

944: Whilst the site history is acknowledged, this does not necessitate the removal of the requirement for a Habitats Regulations Appraisal or a Construction Environmental Management Plan. Site constraints remain unchanged and should a separate application proposal come forward at the site then it would be necessary for any applicant to demonstrate that there would be no significant impacts in terms of flooding or habitats.

859: The issue as to whether or not further use classes should be permitted at OP63 has been covered by the response to this representation under Issue 8. The site sits within an area which feeds into the River Dee Special Area of Conservation. A reference to the requirement for a Habitat Regulation Assessment is required for consistency and it should

be noted that there are a number of other sites of a similar distance to the Dee itself which have this as a requirement under Appendix 2.

1146: The inclusion of the wording “*or if a decision is made not to pursue them*” makes it clear that if the proposed uses are not viable then the site will remain protected as open space. Such clarity is important, the site is either developed for the proposed uses or stays as open space.

Comments Noting Content or Seeking Clarification

888: Policy NE3 – Our Natural Heritage outlines that development that is likely to impact upon a nationally designated site will only be supported where it would not adversely impact the integrity of the area or the qualities for which it has been designated. Where adverse impacts are unavoidable, they must be clearly outweighed by social, environmental or economic benefits of national importance. As a site of national importance the Site of Special Scientific Interest would remain protected from negative impacts.

892: The total site area exceeds 2 hectares and consequently a masterplan will be required for this site as per the Council’s requirements set out in its Masterplanning Process guidance (CDXX). The allocation includes the requirement of 19 homes, a hydro-electric scheme, fish pass, football pitch, changing facilities and car parking for Culter Youth Football Club and a new pathway opening up access to existing woodland and these elements have to be brought together comprehensively.

892: Comments are noted however the contents of any masterplan for OP62 will be a matter to be addressed by development management rather than being set out in the Local Development Plan.

Appendix 3

Changes to Content

888: At present there is no agreed shelf life for Masterplans. Masterplans are however reviewed at the adoption of each new Local Development Plan. Iterative updates have taken place with some masterplan documents to take account of modified phasing.

888, 892: As discussed above, it is not necessary to reference the requirement for a Masterplan in Appendix 2 for the sites set out and consequently it is not necessary to include these in Appendix 3 either.

910: Appendix 3 includes the Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zones at Bay of Nigg (OP56, OP61 and OP62) (CDXX). This is included on a list of Masterplans to be adopted as planning guidance. The Aberdeen Harbour Board Masterplan 2020 (CDXX) is not a document which has been adopted by the Council and is not a material consideration for any planning decisions at Aberdeen South Harbour.

Appendix 5

Comments Seeking Clarification

576: The land in question is owned by Aberdeen City Council.

Reporter's conclusions:

Reporter's recommendations:

Issue 42	CITY WIDE PROPOSALS MAPS	
Development plan reference:	City Wide Proposals Map, Additional City Wide Proposals Map (Constraints Map)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Opportunity North East (887) Aberdeen Harbour Board (910)</p>		
Provision of the development plan to which the issue relates:	City Wide Proposals Map, Additional City Wide Proposals Map (Constraints Map)	
Planning authority's summary of the representation(s):		
<p><u>City Wide Proposals Map</u></p> <p>887, 910: The respondents consider that there is a need to amend the City Wide Proposals Map to include protected land for future transport links supporting the Aberdeen Harbour South and the Energy Transition Zone. The route options which require protection are set out with in the Scottish Transport Appraisal Guidance (STAG) appraisal.</p> <p>910: The respondent is of the opinion that at South Harbour, the allocations OP56, OP61 and OP62 are supported but should be increased to align with the provided map (SD XX) in accordance with the Aberdeen Harbour Board Masterplan 2020.</p> <p><u>Additional City Wide Proposals Map (Constraints Map)</u></p> <p>910: The Harbour Port Boundary should include the South Harbour given its development.</p> <p>910: The area to the north of the South Harbour is identified as Undeveloped Coast but should be identified as Developed Coast as it includes a man-made golf course, Listed Buildings and an area previously used as temporary construction compounds.</p>		
Modifications sought by those submitting representations:		
<p><u>City Wide Proposals Map</u></p> <p>887, 910: Amend the City Wide Proposals Maps to include the Scottish Transport Appraisal Guidance (STAG) options to transport routes required to support road infrastructure to South Harbour. 910: Amend City Wide Proposals Maps to increase size of allocation OP56, OP61 and OP62 to align with map provided (SD XX) and accord with the Aberdeen Harbour Board Masterplan 2020.</p> <p><u>Additional City Wide Proposals Map (onstraints Map)</u></p> <p>910: Amend the Harbour Port Boundary on the Additional City Wide Proposals Map (Constraints Map) to include the South Harbour.</p>		

910: Amend the northern area of the South Harbour on the Additional City Wide Proposals Map (Constraints Map) to Developed Coast from Undeveloped Coast.

Summary of responses (including reasons) by planning authority:

City Wide Proposals Map

887, 910: As stated in response to similar issues raised in Issue 35: Transport the Aberdeen City Region Deal contains a commitment to improving the external transport links to Aberdeen South Harbour. At the time of consultation on the Proposed Local Development Plan the work required to assess preferred options for transport links was ongoing. A Scottish Transport Assessment Guidance (STAG) option appraisal process has recently been completed, and a preferred option approved by the Council's City Growth and Resources Committee (03/02/21) (CDXX). The preferred option A4 involves an upgrade of the existing coast road, replacing the existing rail crossing and accessing Wellington Road via Hareness Road. While there is now commitment on the part of the Council further work is required to determine the final route and area of land required to deliver any interventions. It would therefore be premature to designate this intervention as Land For Transport.

The next substantive stage of work will be the design process, but prior to that an Updated Strategic Business Case (USBC) is required, which will be the document used to access subsequent city Region Deal funding, and provide project assurance, to the City Region Deal Board, Scottish Government and UK Government regarding the arrangements for the design process. The USBC will therefore focus both on the case for the investment and preferred option, but importantly, provide a forward plan for the execution of the design process.

It is therefore not appropriate to set aside Land For Transport in the Proposed Local Development Plan relating to access to the Aberdeen Harbour South.

Additional City Wide Proposals Map (Constraints Map)

910: The boundary for OP62 is sufficient to define the area of the Aberdeen Harbour South extension. The project is ongoing and not fully complete or operational. Upon this and the determination of legal boundaries the future harbour boundary can be defined. It is premature to amend site boundaries at this point.

910: As above the project is yet to be completed. Upon completion it can be determined the extent of the coast which has been developed. It is therefore premature to amend the Additional City Wide Proposals Map (Constraints Map).

Reporter's conclusions:

Reporter's recommendations: