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Dear Andrew,

**Town and Country Planning (Scotland) Act 1997
Notice of Intention to Adopt – Aberdeen City Council Local Development Plan (as modified)**

I refer to your correspondence of 15th December 2022, regarding Aberdeen City Council's intention to adopt the proposed Aberdeen City Council Local Development Plan (as modified).

Scottish Ministers have decided that the proposed plan as notified is unsatisfactory and hereby direct under section 20(5) of the Town and Country Planning (Scotland) Act 1997, that Aberdeen City Council consider modifying the proposed Aberdeen City Council Local Development Plan 2 as indicated in the Annex to this direction.

This direction is considered necessary to ensure the Local Development Plan takes account of the fact that National Planning Framework 4 (NPF4) has been adopted and that this replaces National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP), and that Strategic Development Plans (SDPs) have now ceased to have an effect and are no longer part of the development plan. The current proposed local development plan is considered to be unsatisfactory to the extent that it seeks to continue in effect policies that have been superseded by NPF4

Section 20(6) provides (subject to any further direction under section 20) that your authority may not adopt the Aberdeen City Council Local Development Plan 2 unless you satisfy Scottish Ministers that you have made the modifications necessary to conform with this direction, or the Scottish Ministers withdraw it.

I would be grateful if you would therefore confirm that your authority will modify the plan.



Yours sincerely

Allen Hughes
Planning, Architecture and Regeneration Division

ANNEX

Reference	Modification	Reason for Modification
Contents page 1	Remove “Aberdeen City and Shire Strategic Development Plan” and renumber as required.	To reflect the changing context for the plan.
Page 6 paragraph 1.1.2	Remove “, from The Planning (Scotland) Act 2019 through the National Planning Framework, Scottish Planning Policy, down to Local Development Plans and Aberdeen Planning Guidance.”	To reflect the changing context for the plan.
Page 13 List under paragraph 1.4	Add “National Planning Framework 4” Remove “Scottish Planning Policy” Remove “Aberdeen City and Shire Strategic Development Plan”	To reflect the changing context for the plan including the adoption of National Planning Framework 4 on 13 February 2023.
Page 15 paragraph 2.2	Remove “The National Planning Framework (NPF3) is currently under review and its replacement will set out Scotland’s vision for the future as well as introducing national policies on various topics. The current”	As above.
Page 15 paragraph 2.3	Remove “Planning authorities must take NPF3 into account when preparing local development plans and it is a material consideration in determining planning applications. This will remain the position until it is replaced by NPF4.”	As above
Pages 15 and 16	Remove paragraphs 2.4, 2.5 and 2.6	As above
Page 16 paragraph 2.8	Add “Given the timing of this plan, a pragmatic approach has been taken to changes in the planning system. National Planning Framework 4 was adopted following the examination and subsequent modification of this plan, and as a result some terminology referred to here may vary from the new policy framework. References to the Scottish Planning Policy in the Proposed Plan have been removed to minimise confusion. References to the Strategic Development Plan have been minimised but retained where necessary to explain the source of data and requirements, but it should be	To explain how the changing planning system has been reflected in the plan as a whole.

	noted that this plan, together with NPF4 now forms the basis of the statutory development plan.”	
Page 16 paragraph 2.11	Remove “and the Strategic Development Plan”	To reflect the changing context for the plan.
Page 17 paragraph 3.1	Remove “the wider strategic aims of the Strategic Development Plan and”	As above
Page 17 paragraph 3.4	Remove paragraph 3.4 and table 2 (and related footnotes) and replace with: From February 2023, the National Planning Framework forms part of the statutory development plan. It sets out a 10 year Minimum All-Tenure Housing Land Requirement of 7,000 units at Annex E. This plan was prepared on the basis of the Strategic Development Plan that was part of the statutory development plan at that time, which set out a Housing Land Requirement of 21,450 for 2016 to 2032. Proposals are already progressing or are in the pipeline for much of the land that will accommodate these requirements. Most of this requirement will be met through established sites identified through this local development plan with a focus on sites that are deliverable within the timeframe to 2032. There will also be a continued emphasis on meeting the needs of the whole community including through the provision of affordable housing. Monitoring and review of the contribution of the land supply to delivering affordable housing will be important in this respect.	As above
Page 18 Paragraph 3.5	Remove: “in Table 2”	As above
Page 18 paragraph 3.5	At title of Table 3 remove “Housing and” In table 3, remove the part/columns relating to Housing Allowances	As above
Page 18 Paragraph 3.6	Add text to the start of paragraph 3.6 “This LDP was prepared on the basis that”	As above
Page 18 paragraph 3.6	Second sentence, after “allocation for”, remove “housing and”	As above
Page 18 paragraph 3.7	Remove “The Strategic Development Plan 2020 states that” Capitalise the following sentence.	To reflect the changing context for the plan.

	Remove “endorses that approach and” Remove “in line with SDP targets”	
Page 18 paragraph 3.8	Remove “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. The Strategic Plan states that” Capitalise the following sentence. Remove “new allowance includes” and replace with “sites include”	As above
Page 19 paragraph 3.9	Remove “That leaves a potential shortfall in the new housing land allowance of some 1568 units. However Scottish Planning Policy places the focus on the maintenance of a five year land supply drawing from all sources.” Remove “enable the future maintenance of the 5 year effective supply”. Replace with “come forward.”	To reflect the changing context for the plan including the adoption of National Planning Framework 4 on 13 February 2023.
Page 20 paragraph 3.11	Remove “(used as the basis for calculating the Strategic Development Plan allocations)”	As above
Page 20 subheading after paragraph 3.12	Remove “Period 2 Allowances 2033 -35 and Period 3 Allowances 2036-40 Replace with “Sites beyond 2033”	As above
Page 20 paragraph 3.13	Remove “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.”	To reflect the changing context for the plan.
Page 21 paragraph 3.14	Remove whole paragraph: “The Strategic Development Plan 2020 asks Local Development Plans to make sure there is at least 60 hectares of marketable land available to businesses at all times in a range of places within Aberdeen City. In addition, at least 20 hectares of the marketable employment land in the Strategic Growth Areas should be of a standard which will attract high quality businesses or be suitable for company headquarters.”	To reflect the changing context for the plan.

Page 21 Paragraph 3.17	After Part A – Existing Housing Allocations and Housing remove “Allowances” and replace with “sites” After Housing and employment development on existing allocated sites and housing remove “allowance”	As above
Page 22 Policy LR1	Remove “The council will work with developers, service providers and other partners to maintain the 5 year supply of effective housing land at all times, along with the supply of employment land.” Replace with “The council will work with developers, service providers and other partners to maintain a sufficient pipeline of deliverable housing land along with the supply of employment land.”	To reflect the changing context for the plan and in particular Policy 16 of NPF4.
Page 22 paragraph 3.18	Remove “Policy LR1 at Part A supports the maintenance of a 5 year effective supply of housing land at all times (in the relevant 10 year period to 2032). This is to provide a supply of land sufficient to meet the housing land requirement as established in the strategic plan. It is recognised above that there is a shortfall in terms of those sites specifically identified to meet the strategic allowance. Consequently”	To reflect the changing context for the plan.
Page 22 paragraph 3.19	Remove “This will result in the replacement of the strategic development plan context with that to be established through the new National Planning Framework.” and “This is particularly important in the circumstances where the extent of new allowance sites identified through this local development plan falls short of that envisaged by the current strategic plan.	To reflect the changing context for the plan.
Page 23 paragraph 3.23	Remove “and meet the requirements of the Strategic Development Plan.”	To reflect the changing context for the plan.
Page 36	Under “Delivering Sustainable Communities” remove “and how we will meet the objectives and targets of the Strategic Development Plan.”	To reflect the changing context for the plan.
Page 36 paragraph 5.1	Remove “National Planning Framework 3, Scottish Planning Policy and the Aberdeen City and Aberdeenshire	To reflect the changing context for the plan.

	Strategic Development Plan all highlight the relationship between well planned places, a healthy lifestyle, wellbeing and social inclusion.”	
Page 41 paragraph 6.4	Remove “The Strategic Development Plan sets objectives for the region ensuring that...” Replace “new” with “New” Add “should ensure that it” between “development” and “safeguards”	To reflect the changing context for the plan.
Page 42 paragraph 6.6	Remove “Scottish Planning Policy states that”. Capitalise the following sentence. Remove “In line with the Strategic Development Plan,”. Capitalise the following sentence.	As above
Page 42 paragraph 6.7	Remove “In line with the Scottish Planning Policy,”. Capitalise the following sentence.	As above
Page 42 paragraph 6.8	Remove “In line with the Scottish Planning Policy”. Capitalise the following sentence.	As above
Page 43 paragraph 6.12	Remove “Scottish Planning Policy states that”. Capitalise the following sentence.	As above
Page 47 bullet 2	Remove “Scottish Planning Policy and”	As above
Page 48 paragraph 6.32	Remove “as set out in Scottish Planning Policy”	As above
Page 53 paragraph 7.1.	Replace “NPF3” with “NPF4”, remove “Scottish Planning Policy”	As above
Page 60 paragraph 7.15	Remove “Scottish Planning Policy and” Amend “NPF3” to “NPF4”	As above
Page 66 paragraph 8.5	Remove “Scottish planning Policy requires” Insert “are required to” after “Planning authorities”	As above
Page 68 paragraph 8.12	Replace “Scottish Planning Policy” with “National planning policy”	As above
Page 69 paragraph 8.13	Remove “The Strategic Development Plan has identified”. Capitalise the following sentence. Remove “The Strategic Development Plan notes that”	As above.
Page 71 paragraph 8.17	Remove “Scottish Planning Policy and National Planning Framework 3” Replace with “National planning policies”	As above
Page 76 paragraph 9.8	Remove “Scottish Planning Policy states that where a demand is identified through Housing Need and Demand Assessment (HNDA), polices should be put in place to	As above

	mitigate for this change through the provision of suitable housing.” Replace with “National planning policies support proposals for new homes which address identified gaps in provision, which could include homes for older people, including supported accommodation, care homes and sheltered housing.”	
Page 77 paragraph 9.13	Remove “and take into consideration the Strategic Development Plan affordable housing targets, the provisions of Scottish Planning Policy and Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits; which sets a benchmark of 25% provision for new developments.”	As above
Page 101 paragraph 12.1	Remove “The Strategic Development Plan requires a ready supply of employment to be maintained in the city. Therefore to” Start the following sentence with “To”	As above.
Page 108	Under “Ecosystems Services” Remove “As defined in Scottish Planning Policy,”	As above
Page 109	Remove “Effective Land Supply Sites which have no constraints and are available for development.”	As above
Page 112	Under Strategic Development Plan Remove “to be replaced by Regional Spatial Strategies.” And replace with “and no longer part of the statutory development plan.”	As above
Page 115	Remove “Consequently they are not counted as part of the strategic allowance as set out in Chapter 3 of the plan. Nevertheless” Capitalise the next sentence	As above