

Respondent No	Summary of comment	Response to comment	Action/Changes made
<p>Air Quality</p> <p>408 (57)</p>	<p>We support the inclusion of the Supplementary Guidance on Air Quality Issues in the Local Development Plan which will support any proposed Air Quality policy and in general terms consider that the Supplementary Guidance is of a good standard and will assist the Council in tackling, in a land use context, air quality issues affecting Aberdeen City. We make the following comments which it is considered could further improve the document.</p> <p>Figure 1 is welcomed however it could be further improved by clarifying which parties will be involved at which stage e.g. are pre-application discussions with the Planning Service or Environmental Protection Service? It could also be made clearer which consultees would be involved and at what stage in the application process they would be consulted.</p> <p>Figure 2 is welcomed as it will provide a ready means for Planning Officers to determine the types of developments where Air Quality Assessments will be required; however we recommend that it be clarified further. Terms such as 'small' residential would benefit from further clarification (how many houses/flats/parking spaces?) and the term 'major' could be confusing in the context of the Hierarchy of Development as set out in the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009, which holds a specific definition of 'major' developments. In order to avoid confusion we suggest another term should be used</p>	<p>It is accepted that Figure 1 could be further improved by clarifying which parties will be involved at which stage. Figure 1 will be amended to include further information regarding the various parties involvement in the application process. It is felt however, that making reference to all consultees that would be involved in the planning application process and at what stage they would be involved would over complicate Figure 1 and make it difficult to understand and follow.</p> <p>It is also accepted that Figure 2 could be further improved by clarifying certain terms. Figure 2 will be amended to reflect SEPA's suggestions.</p> <p>It is also accepted that the document "Air Pollution: Action in a Changing Climate 2010" should be added into the related links section at the back of the document.</p>	<p>Amend Figure 1 to include further information regarding the various parties involvement in the application process.</p> <p>Amend Figure 2 to provide greater clarity. Add in "<80 dwellings or 1 ha site" after 'small residential development'. Remove reference to 'major commercial' and replace with "Medium/large commercial". Remove reference to 'PPC registration' and replace with "PPC Permit". Also add in reference to "Scottish Environment Protection Agency" as a key consultee for the category of 'Industrial Development requiring PPC Permit'.</p> <p>Add reference to the document "Air Pollution: Action in a Changing Climate 2010" to the related links section at the back of the document.</p>

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	<p>(medium to large-scale). Furthermore in the Development Category Industrial Development requiring PPC registration it is requested that this is amended to Industrial Development requiring PPC Permit and that SEPA is included as well as Environment Protection Service as key consultee for this category of development.</p> <p>DEFRA and the devolved administrations recently published a document that encourages local authorities to integrate climate change and local air quality. Road traffic is the main source of atmospheric pollution in the urban centres and it is also the second largest source of greenhouse gas emissions, therefore the two are inextricably linked and could be addressed as a single issue. The document Air Pollution: Action in a Changing Climate emphasises: Now is the right time to consider how we can achieve these additional benefits, particularly from improving public health, through a closer integration of air quality and climate change policies. It is recommended that this be included in the Related Links section.</p>		

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Changes made by officers, not as a result of comments received.			A section emphasising the particular importance of applicants consulting with the Environmental Protection Service when applying for biomass or combined heat and power units has been added and a definition of pollution prevention and control (PPC) permits has been added for greater clarity.
Shopfronts and Advertisements Design Guide	No comments received		
Shopfront Security	No comments received		
Transport & Accessibility 254 (2)	The guidance on cycle parking standards is a straight copy of the existing guidance. This current guidance has not prevented planning failure in respect of cycle parking at some recent developments. The guidance thus requires greater clarity and, in places, strengthening. The guidance should clearly state in the opening section that all types of use should provide both short stay cycle parking for visitors/customers and long stay cycle parking for staff. ACF believes the maximum 50m distance away from the main entrance for short stay parking is too far - 25m should be the maximum distance. It should be clear that residential flat developments should provide short stay cycle parking for visitors. The 25m should not involve the crossing of a heavily	The guidance on cycle parking standards was updated following a review of previous cycle parking standards associated with the 2008 Local Plan, which was carried out in partnership with the Aberdeen Cycle Forum. The emerging Transport and Accessibility Supplementary Guidance will form part of the Local Development Plan. In particular, Policy D3, which relates to Sustainable and Active Travel, strengthens the requirement for the provision of cycle access through new	Amend the sentence, "Weather protection is also desirable" to "As weather protection for cycle parking is highly desirable developers will need to consider this at an early stage in the design of new developments". Amend the sentence, "This type of facility should be located in a convenient and prominent position, preferably adjacent to the entrance of a building, with an absolute maximum of 50m from the entrance" to, "This type of facility should be located in a safe, convenient, accessible and prominent position, preferably on-site and adjacent to the entrance of a building, and an absolute

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	<p>trafficked road. ACF wishes to see the guidance on weather protection strengthened. The current guidance says weather protection is 'desirable' - this should be upgraded to 'essential' for new build developments. There should be a standard for cycle access. ACF suggests 'Developments should be accessible from the road network by safe cycle links and should, where necessary, provide required cycle infrastructure in the vicinity of the development'. The order of the parking standards should reflect the transport hierarchy in Scottish Planning Policy. Thus the cycle parking standards should come first, and car parking standards last.</p>	<p>development.</p> <p>The Supplementary Guidance includes standards for both short and long term cycle parking within all new developments and it is implicit that both are considered. However, there may be circumstances where the provision of short stay parking may not be appropriate for uses which have little or no visitors and equally there are some locations where a shared facility may be sufficient. It is not therefore considered to be appropriate to apply a combined blanket standard for short and long stay for all developments.</p> <p>The SG requires that long stay parking is covered. The provision of weather protection for short stay parking is supported and can be effectively planned into new developments. Such facilities may not be appropriate where their provision would conflict with heritage and conservation issues and the desire to rationalise street furniture, for example parts of the City Centre. In light of the above,</p>	<p>maximum of 50m from the entrance".</p>

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		<p>we can not agree with the suggested change to make the provision of weather protection for short stay parking an essential requirement. However, we suggest the inclusion of the following text to ensure that such facilities are provided in new developments: "As weather protection for cycle parking is highly desirable developers will need to consider this at an early stage in the design of new developments".</p> <p>For some developments a maximum distance of 25 metres from short stay parking facilities to the main entrance may be too restrictive, or unachievable in some circumstances. 50 metres represents an absolute maximum distance and would take less than 30 seconds to walk. We would agree with the objective of not crossing heavily trafficked roads in terms of public safety and would expect to see cycle parking facilities on site and as close to the entrance as possible. In order to strengthen this section, the sentence, "This type of facility should be located in a</p>	

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		<p>convenient and prominent position, preferably adjacent to the entrance of a building, with an absolute maximum of 50m from the entrance" will be amended to, "This type of facility should be located in a safe, convenient, accessible and prominent position, preferably on-site and adjacent to the entrance of a building, and an absolute maximum of 50m from the entrance".</p> <p>Policy D3 of the Aberdeen Local Development Plan deals with cycle access to and from new developments and will help to ensure that an appropriate standard of cycle access is provided through the masterplan and planning application process.</p> <p>With reference to the ordering of the standards, these are not presented in any particular order and are not representative of transport hierarchy and/or priority. Policy D3 - Sustainable and Active Travel sets out the priorities in terms of transport hierarchy and states that, "Access to, and movement</p>	

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		<p>between, new and existing developments will prioritise transport modes in the following order - walking, cycling, public transport, car and other motorised vehicles". This reflects the transport hierarchy set out in Scottish Planning Policy.</p>	
269 (2)	<p>Any new properties should have at least 2 off-road parking spaces per property - I would suggest this is adopted as Aberdeen city is already a nightmare for on-road parking.</p>	<p>Paragraph 171 of Scottish Planning Policy states that "The availability of parking can have an important influence in reducing reliance on the car" and requires planning authorities to apply maximum car parking standards to encourage modal shift. Therefore, it would not be appropriate to set minimum car parking standards.</p> <p>The car parking standards in the Transport and Accessibility Supplementary Guidance document were established by taking account of current demands and potential future requirements for parking spaces in the City, and other policy measures, such as encouraging alternatives to the car, that are likely to affect this issue.</p> <p>The Transport and Accessibility</p>	None.

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		<p>Supplementary Guidance proposes that in Outer City areas the residential car parking standard is a maximum 2 spaces per dwelling for up to 3 bedroom properties, and 3 spaces per dwelling for 4 bedroom properties.</p> <p>Properties that are situated closer to the centre of Aberdeen (Inner City area and City Centre) have more restrictive standards to reflect their location in relation to public transport links. This approach complies with paragraph 172 of Scottish Planning Policy which states that, "where an area is well served by public transport, more restrictive standards may be appropriate."</p>	
1561 (28)	<p>Bancon object to the supplementary guidance (SG) on the grounds that essential information is missing, and that this must be the subject of appropriate public scrutiny. Bancon therefore submit that the SG be subject to appropriate public scrutiny once a detailed set of guidelines can be provided, incorporating the principles of Designing Streets. There must be no potential for conflict between the SG (contributing a material contribution to the determination of planning applications and the preparation of masterplans) and the standards required by the</p>	<p>Section 4 of the draft Transport and Accessibility Supplementary Guidance was intended to be an informative paragraph only, indicating the Council's intention to review its 1998 publication "Guidelines and Specification for Roads within Residential and Industrial Developments". This review takes account of Designing Streets and the Council intends to publish a</p>	<p>Amend Section 4 to reflect the review of "Guidelines and Specifications for Roads within Residential and Industrial Developments".</p> <p>Request six week public consultation period and report back to Council at a later date.</p>

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	Roads Service at Roads Construction Consent stage.	revised version of this document in due course. In the meantime, the Council is publishing for consultation an updated Transport and Accessibility Supplementary Guidance which reflects the principles of Designing Streets.	
Changes made by officers, not as a result of comments received.			<p>A figure indicating the required dimensions of Sheffield stands has been added to the section on Sheffield Stand Specifications to add clarity and amend a drafting error.</p> <p>Figure 3 – Zones for Parking Standards has been amended to better reflect public transport accessibility standards.</p>
<p>Low and Zero Carbon Buildings</p> <p>408 (60)</p>	<p>We welcome the production of Supplementary Guidance to support the delivery of low and zero carbon technology in new developments in order to contribute to meeting Scotland’s Climate Change emissions reduction targets. The following comments are made in the interests of improving the clarity of the document.</p> <p>Under the Pre-application Discussions section it is recommended that the following be added. Micro-hydro schemes may require authorisation from SEPA under the Water Environment (Controlled Activities) (Scotland) Regulations 2005.</p>	<p>Agree that Guidance should reference the potential that micro hydro schemes may require authorisation from SEPA.</p> <p>This Supplementary Guidance is restricted to setting further detail on policy R7 and additional requirements can not be added.</p> <p>Agree, that reference should be added. .</p>	<p>Under the Pre-application Discussions section it is recommended that the following be added. Micro-hydro schemes may require authorisation from SEPA under the Water Environment (Controlled Activities) (Scotland) Regulations 2005.</p> <p>SEPA guidance document Supporting Guidance WAT-SG-62 Geothermal Abstraction - Geothermal Energy http://search.sepa.org.uk/sepa?action=search&q=geothermal%20energy is also included under the Useful Documents</p>

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	<p>As climate change may lead to more erratic rainfall patters and therefore impact on water supplies there is an increased need to use water more effectively and efficiently, it is therefore requested that the Supplementary Guidance also include a reference to designing new developments to minimise water use.</p> <p>It is recommended that SEPA guidance document Supporting Guidance WAT-SG-62 Geothermal Abstraction - Geothermal Energy http://search.sepa.org.uk/sepa?action=search&q=geothermal%20energy is also included under the Useful Documents section of the Supplementary Guidance.</p>		<p>section of the Supplementary Guidance.</p>
1464(12)	<p>Object to the requirement to be achieved through the use of low and zero carbon technologies. The requirement in the Climate Change (Scotland) Act 2009 in short sighted and a greater emphasis should have been made on the way in which materials and build methods reduce carbon emissions as opposed to the ad-hoc use of LZCTs which can be costly to install and do not in every instance make the required carbon savings, are not always cost effective and have a long pay back period for the householder.</p> <p>Policy should be changed to read: " All new buildings, in meeting building regulations energy requirements must achieve carbon reduction saving methods to reduce the predicted carbon dioxide emissions by at least 15% below the 2007</p>	<p>It is the Council's interpretation of section 3F of the Town and Country Planning (Scotland) Act 1997 that savings for all new buildings must be through the use of low and zero carbon generating technologies.</p> <p>However, it is accepted that the most efficient way to reduce emissions is to improve the efficiency of the building before adding renewable technologies. Therefore, the Supplementary Guidance will include instances in which a lower or no proportion of low and zero carbon</p>	<p>Amend policy to include new section on instances where development of a lower or with no proportion of low and zero carbon generating technologies will be accepted.</p>

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	<p>building standards."</p> <p>The policy requires to be flexible to respond to continuing changes in Scottish Government policy. The government are currently reviewing their position at the present time and are considering many other mechanisms to achieve reduced carbon such as carbon offsetting.</p>	<p>generating technologies will be accepted. If an additional CO2 saving can be delivered above current building standards or a contribution to the improvement of the existing stock is made then there would be a net CO2 reduction beyond the policy requirement and this is considered to further contribute to the targets set by the Climate Change (Scotland) Act 2009 and would be considered to meet the requirements of this policy.</p>	
1561 (30)	<p>Bancon object to the above supplementary guidance (SG) on the grounds that it seeks a mandatory 15% of the reduction in carbon emissions from new buildings to be delivered through the installation of Low and Zero Carbon Generating Technologies. This is contrary to the view that carbon emissions are best reduced through a 'fabric first' approach of reducing the energy demand through improving insulation and construction.</p> <p>Bancon therefore submit that Policy R7 and SG8.1 be amended to remove all reference to a percentage requirement for the provision of low and zero carbon generating technologies, in line with both the Climate Change (Scotland) Act 2009 and SPP. Developers should be required to provide detailed sustainability statements, as they do for Building Warrant applications, and this</p>	<p>It is the Council's interpretation of section 3F of the Town and Country Planning (Scotland) Act 1997 that savings for all new buildings must be through the use of low and zero carbon generating technologies.</p> <p>However, it is accepted that the most efficient way to reduce emissions is to improve the efficiency of the building before adding renewable technologies. Therefore, the Supplementary Guidance will include instances in which a lower or no proportion of low and zero carbon generating technologies will be accepted. If an additional CO2</p>	<p>Amend policy to include new section on instances where development of a lower or with no proportion of low and zero carbon generating technologies will be accepted.</p>

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	<p>should be assessed appropriately through the planning application process by the Development Management planner. The proposed policy removes any form of common sense from this process, and puts an unreasonable burden on developers to develop buildings that use far more energy than required.</p>	<p>saving can be delivered above current building standards or a contribution to the improvement of the existing stock is made then there would be a net CO2 reduction beyond the policy requirement and this is considered to further contribute to the targets set by the Climate Change (Scotland) Act 2009 and would be considered to meet the requirements of this policy.</p>	
<p>Harmony of Uses 24(8)</p>	<p>The number of licensed premises needs to be cut in the City Centre.</p>	<p>The number of licensed premises is not a planning issue but one for the Licensing department. As a planning authority we determine applications using the Use Classes Order 1997. It is not a planning consideration what the actual use of the unit will be unless it has an affect on amenity (such as residential or environmental). Therefore, as a planning authority we are unable to decrease the number of licensed premises in the City Centre.</p>	<p>No change</p>
<p>373 (8)</p>	<p>Harbour should be included as a 'bad neighbour'. Need to account for the future expansion of Harbour related operations that could give rise to noise complaints. The phrase 'in perpetuity' be added to the end of the first sentence on the 4th paragraph of page 19 of SG 1.5, and that a 5th</p>	<p>We agree that the Harbour should be included within this SG as a 'bad neighbour'. With regards to adding the phrase 'in perpetuity' we disagree that this should be added as there is no</p>	<p>Make suggested changes.</p>

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	<p>criteria be added to the list on the same page, as follows: '5. The proposal is located within or in close proximity to the Harbour boundary unless it can be demonstrated through a detailed noise survey that a satisfactory level of residential amenity can be achieved taking account of background noise levels.'</p>	<p>way in guaranteeing residential amenity in perpetuity. We agree in principle with the fifth criteria. However, we have amended the wording to read 'The proposal is located within or adjacent to the Harbour boundary unless it can be demonstrated through a detailed noise assessment submitted prior to determination of any planning application by a suitably qualified consultant that a satisfactory level of residential amenity can be achieved taking account of background noise levels.'</p>	