

## ABERDEEN CITY COUNCIL

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<b>COMMITTEE</b>	Council
<b>DATE</b>	2 July 2025
<b>EXEMPT</b>	No
<b>CONFIDENTIAL</b>	No
<b>REPORT TITLE</b>	Aberdeen Local Development Plan – Evidence Report
<b>REPORT NUMBER</b>	CR&E/25/165
<b>EXECUTIVE DIRECTOR</b>	Gale Beattie
<b>CHIEF OFFICER</b>	David Dunne
<b>REPORT AUTHOR</b>	Andrew Brownrigg
<b>TERMS OF REFERENCE</b>	11

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### 1. PURPOSE OF REPORT

- 1.1 To inform Council of the work undertaken to prepare the Evidence Report for the Local Development Plan 2028, and to request approval to send the Evidence Report to Scottish Ministers for consideration through the Gate Check process. During the Gate Check the Evidence Report will be reviewed and assessed by an independent Reporter appointed by the Scottish Government. This will determine if the council has sufficient and appropriate information to prepare the next Local Development Plan. If so, the Planning Authority can then move to the next step which is writing the Proposed Local Development Plan.

### 2. RECOMMENDATIONS

That Council:-

- 2.1. Instruct the Chief Officer – Strategic Place Planning to submit the Evidence Report (Appendix 1), and appropriate supporting documentation, to Scottish Ministers, subject to any necessary minor drafting changes to satisfy the requirements of the Gate Check process.
- 2.2. Note the outcome of the engagement undertaken on the Evidence Report Topic Papers and, in particular, the areas of agreement and the remaining disputes, as summarised in paragraphs 3.10 to 3.12 below and Sections 5 and 7 of Appendix 1.
- 2.3. Instruct the Chief Officer - Strategic Place Planning to publish the Evidence Report (Appendix 1) and other technical background documents (subject to any necessary minor drafting changes) (Appendices 2 to 4) which will support the development of the Proposed Local Development Plan on the Council's website as soon as practicable.
- 2.4. Noting the content of Appendix 4 – Play Sufficiency Assessment, and recognising that play is not only important to children, but to well-being throughout life, instruct the Chief Executive to refresh the existing Aberdeen

Play Strategy 2018 to better emphasise the importance of play from birth to old age, and refer the draft objectives of the refreshed strategy to the 2026/27 budget setting process, alongside any other relevant information on open space provision.

- 2.5. Authorise the Chief Officer – Strategic Place Planning to respond to any requests for further information or clarification issued by the Planning and Environmental Appeals Division of the Scottish Government during the course of the Gate Check.
- 2.6. Authorise the Chief Officer - Strategic Place Planning to make any technical amendments to the Evidence Report and supporting documents as a result of the Gate Check process.

### **3. CURRENT SITUATION**

#### **Background**

- 3.1. On 19 June 2023 the Aberdeen Local Development Plan (LDP) 2023 was formally adopted by the Council and constituted as part of the statutory Development Plan.
- 3.2. In August 2024 the Council's Finance & Resources Committee agreed an annual update on the Development Plan Scheme (DPS) - the document which sets out a planning authority's programme for preparing and reviewing their Local Development Plan. The DPS shows a target adoption date for the next Local Development Plan as being in Spring 2028, to align with a requirement from Scottish Government that every planning authority in Scotland should have a new style LDP in place within around 5 years of the Town and Country Planning (Development Planning) (Scotland) Regulations 2023 coming into force.
- 3.3. The Evidence Report is the first formal stage in the preparation of the next Local Development Plan. A report on beginning the preparation of the Evidence Report was presented to Council at its meeting on 03 July 2024 (CR&E/24/187). The Evidence Report sets out robust data in order to inform the planning authority on its approach to specific issues, and the Report will inform preparation of a 'Proposed Local Development Plan'. It comprises a range of information including research, early engagement and technical reports on a range of topics. The requirement for an Evidence Report stems from Section 16B of the Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2019. As such, this is the first time Aberdeen City Council has prepared an Evidence Report as part of its local development plan review process.

#### **Demographic Introduction and Context**

- 3.4. The 'Topic Papers' (explained further in paragraph 3.14 below) form the main content of the Evidence Report, and these are contextualized at the start of the

report by a broad profile of Aberdeen as a place – outlining the City in terms of demographics, the economy, environment and communities and health.

- 3.5. Section 3 of the Report evaluates whether the current adopted plan, the Aberdeen Local Development Plan 2023, has delivered on its outcomes and allocations. It identifies lessons to be learnt in the preparation of the next plan, and considers the appropriateness of the previous spatial strategy. This evaluation does not include specific content on policy or spatial strategy matters for the Aberdeen Local Development Plan 2028 – these will be developed at the next stage.
- 3.6. Section 4 summarises the main issues arising from evidence and key areas of change. It identifies a number of issues and demographic challenges to be addressed in the production of the next Local Development Plan. These very broadly include:
  - Aberdeen's demographics, health and ageing population;
  - Climate change challenges;
  - The development of nature networks and review of the green belt;
  - The composition and condition of the housing stock;
  - The school estate;
  - The transport system and other infrastructure, including energy requirements;
  - The city's open spaces, biodiversity and historic environment;
  - Aberdeen's cultural assets and the role of the city centre; and,
  - Our economic wellbeing and prosperity.
- 3.7. The current Local Development Plan 2023 was the first plan to group a number of policies under a specific Health and Wellbeing topic area, and the first plan to introduce a Health Impact Assessment, a policy specifically designed to assess the impact of certain new developments on the health of the population.
- 3.8. In the next Local Development Plan 2028, this initial work looking at Health, and the Nature and Climate emergencies will be much expanded. In particular working with Public Health Colleagues at NHS Grampian, and the Health Determinants Research Collaboration it is intended to take a health in all policies approach. This aims to ensure all policies within the plan look to improve health outcomes wherever possible, and limit any negative impacts where they are identified.
- 3.9. In this way, the next Local Development Plan has a unique opportunity to both influence, and be developed in the context of, the collaboration announced in February 2025 between Aberdeen City Council, NHS Grampian and Public Health Scotland and Professor Sir Michael Marmot, Director of University College London's Institute of Health Equity. The aim of this collaboration is to strengthen local plans to reduce health inequalities and improve wellbeing in communities, thus enabling people to live longer, healthier lives by addressing the root causes of health inequalities and preventing illness before it starts.

## **Consultation and Engagement**

- 3.10. Work on preparing the Evidence Report commenced in 2024, with stakeholder and public consultation on the Topic Papers, which make up the key part of the report, undertaken in early 2025. Part of this consultation activity was under the umbrella of the Community Planning Aberdeen “Your Place, Your Plans, Your Future” engagement. In total the Planning Authority received 23 responses to the Topic Papers aspect of the consultation. This response rate may appear low, but it is reflective of the very technical stage in Plan preparation we are at, as well as feedback received from across Scotland that this new stage in local development plan production is not as engaging to local communities as the similar ‘Main Issues Report’ stage which was required under the previous legislation.
- 3.11. Section 5 of the Evidence Report outlines the Areas of Agreement / Dispute from the consultation responses. It summarises the key statements of agreement and disputes over the sufficiency of the evidence and the Council’s response to these matters. Work has been ongoing to try and resolve as many of the disputes as practicable, however it has not been possible to resolve all disputes, and the reasons behind this are highlighted. The areas of agreement and dispute relating to specific topics are repeated in the Topic Papers.
- 3.12. Section 6 of the Report sets out legislative requirements, and Section 7 details our Engagement Strategy. The development of this Evidence Report has been aided by a collaborative approach to data and spatial gathering and analysis with Key Agencies and other stakeholders. There has also been consultation and engagement with a wide range of organisations and the community, and has included;
- Engaging internal Council services and Key Agencies, including through the Future Infrastructure Requirements (FIRS) Group.
  - Awareness raising and meetings with the development industry and community councils.
  - Meetings and awareness raising with the public and equality groups through the Your Place, Your Plans, Your Future consultation, including targeted events and drop in sessions.

## **Topic Papers**

- 3.13. The second part of the Evidence Report (Sections 8 – 17) contains the Topic Papers which look in detail at 10 different topic areas. The topic papers contain the bulk of the data and cover the following themes:
- Spatial Strategy;
  - Delivery of Homes;
  - Infrastructure and Communication;
  - Sustainable Transport;
  - Place;
  - Wellbeing of Community;
  - Climate Change, Mitigation and Adaptation;

- Nature and Biodiversity;
- Energy and Resources; and,
- Centres of Business and Culture.

3.14. Finally, Section 18 concludes the Report

### **Background Documents**

3.15. A number of technical background papers have also been produced in order to support the Evidence Report:

- A Draft Strategic Flood Impact Assessment – to identify potential flooding and drainage issues (Appendix 2).
- An update of the Aberdeen City and Aberdeenshire Retail Study has been prepared jointly with Aberdeenshire Council. This study informs our approach to retail planning and the city centre and other retail locations around Aberdeen (Appendix 3).
- Play Sufficiency Assessment – an assessment of the sufficiency of play opportunities for children in their area (Appendix 4).

3.16. In addition, the Evidence Report also recognises that there are a number of further studies required to support the next stage of plan development. These include (but are not limited to) a Cumulative Transport Assessment, Natural Environment Strategy (including Open Space Strategy, Forestry and Woodland Strategy and Green Belt Review) and Brownfield Urban Capacity Study. A Strategic Environmental Assessment of the Local Development Plan will also be carried out. These studies will be carried out over the coming year and will support the development of the Proposed Local Development Plan.

### **Next Steps – Gate Check**

3.17. Subject to Council approval, Officers now recommend sending the Evidence Report to Scottish Ministers for consideration through the Gate Check process. During the Gate Check the Evidence Report will be reviewed and assessed by an independent Reporter appointed by the Scottish Government.

3.18. Prior to submission, officers will ensure that formatting, graphic alignment, mapping and typographic matters are reviewed and refined, and the document brought together as a comprehensive submission. A list of core documents (currently shown as 'CDXX' in the text) will also be prepared, and the text updated as a result. Other minor drafting changes, for example any typographical errors, will also be reviewed and rectified.

3.19. During the Gate Check, it is normal practice for the Reporter to ask for clarifications and/or further information. This report therefore also seeks authority for the Chief Officer – Strategic Place Planning to respond to any such requests and to make any technical amendments to the submitted documents that may be required.

- 3.20. Based on a submission to Gate Check this Summer, and the Scottish Government's Planning and Environmental Appeals Division (DPEA) meeting their 3-month target to respond, the current LDP programme shows preparation of the Proposed Plan beginning in Autumn 2025, with a draft reported to Council for approval to consult publicly in Autumn 2026. As reported to the Net Zero, Environment and Transport Committee on 10 June 2025, it is officers intention to align the programme of public and stakeholder consultation on the revised draft Local Transport Strategy to happen in tandem with the Proposed Plan consultation in order to give important context on how any impacts (cumulate or otherwise) on the transport network from development proposed in the next Local Development Plan by would be managed / mitigated, e.g. by active travel upgrades or projects such as Aberdeen Rapid Transit.
- 3.21. Although the Scottish Government expect Evidence Reports to clear Gate Check within 3 months, it should be noted that the timelines for Gate Check are determined by the capacity of the DPEA, and any delays to Gate Check will impact on the local development plan review programme. The DPEA have already intimated to Officers that, due to a number of other local authorities programmed to submit for Gate Check at the same time, it is possible that the 3-month target may be breached. Officers will keep this under review and liaise with the DPEA on timelines once the Evidence Report has been approved for submission.
- 3.22. It is also worth noting that the Reporter has the power to return the Evidence Report to the Council if it is felt that the report contains insufficient information to enable the Planning Authority to prepare its next local development plan. A number of other local authorities have recently had Evidence Reports returned to them on this basis, such as Glasgow City Council and Fife Council. Officers have reviewed the reasons given by the Reporter in these instances and have also liaised with the DPEA on 'lessons learned' in the run up to finalising the Evidence Report for Aberdeen City Council.

#### **4. FINANCIAL IMPLICATIONS**

- 4.1 There are no direct financial implications associated with this report. The cost of preparing the Evidence Report and other associated documents can be met through the existing Development Plan budget.

#### **5. LEGAL IMPLICATIONS**

- 5.1 Section 16B of the Town and Country Planning (Scotland) Act, 1997 as amended by the 2019 Act, sets out the requirements for the Evidence Report in preparing a Local Development Plan. In summary, it outlines the need to prepare an Evidence Report and the specific requirements to be included (to cover the matters set out at Section 15(5) of the said 1997 Act). It also requires the Council to seek the views of identified groups including the public at large, children and young people, disabled persons, Gypsies and Travellers, Community Councils and Key Agencies. The Evidence Report sets out the

detailed engagement undertaken for each group and how this has been taken account of in the Evidence Report.

## 6. ENVIRONMENTAL IMPLICATIONS

- 6.1 The Evidence Report is essentially a data and information gathering exercise – policies and proposals will be drawn up at the next stage and presented in the Proposed Local Development Plan. There are therefore no significant environmental implications with regards to the Evidence Report. The Local Development Plan itself will be subject to Strategic Environmental Assessment.

## 7. RISK

- 7.1 The assessment of risk contained within the table below is considered to be consistent with the Council's Risk Appetite Statement.

Category	Risks	Primary Controls/Control Actions to achieve Target Risk Level	*Target Risk Level (L, M or H)  *taking into account controls/control actions	*Does Target Risk Level Match Appetite Set?
<b>Strategic Risk</b>	Not delivering the aims of the City Centre Masterplan, LOIP and Local Development Plan.	Ensure that the Evidence Report is produced timeously, subject to any delays encountered by the Scottish Government in terms of the aforementioned Gate Check.	L	Yes
<b>Compliance</b>	Ensuring compliance with National Planning Framework 4.	Ensure that the Evidence Report is produced timeously, subject to any delays encountered by the Scottish Government in terms of the aforementioned Gate Check.	L	Yes

<b>Operational</b>	Ensuring that the Evidence Report can be timeously published in order to support the new plan process.	Ensure that the Evidence Report is produced timeously, subject to any delays encountered by the Scottish Government in terms of the aforementioned Gate Check.	L	Yes
<b>Financial</b>	Not having an up to date Local, Development Plan could lead to uncertainty at planning application stage and potentially lead to more staff time being spent processing applications.	Ensure the timetable for producing the next LDP remains on course wherever possible.	L	Yes
<b>Reputational</b>	The planning authority tries to keep the LDP up to date to allow for clarity and transparency of the development plan process. Failure to continue this could damage the Council's reputation as a planning authority.	Ensure the timetable for producing the next LDP remains on course, wherever possible.	L	Yes
<b>Environment / Climate</b>	Not keeping the LDP up to date opens the possibility of inconsistency in decision making and lower environmental policy standards.	Ensure the timetable for producing the next LDP remains on course, wherever possible.	L	Yes



## 8. OUTCOMES

<b><u>Council Delivery Plan 2024</u></b>	
	<b>Impact of Report</b>
<b>Aberdeen City Council Policy Statement</b>	Empowering Aberdeen's Communities – the Evidence Report Topic Papers were consulted on as part of the Your Place, Your Plans, Your Future engagement thereby setting out the Council's commitment to working with communities and other entities in its preparation.
<b><u>Local Outcome Improvement Plan</u></b>	
<b>Prosperous Economy Stretch Outcomes</b>	The proposals will support the delivery of LOIP Stretch Outcome 1 by identifying areas which may be deficient in services and facilities so that these can be addressed in future policies.
<b>Prosperous People Stretch Outcomes</b>	<p>The proposals within this report support the delivery of LOIP Stretch Outcome 5 by ensuring that children and young people feel listened to in terms of the consultation process in the preparation of a new Local Development Plan.</p> <p>The engagement on the Play Sufficiency Assessment contributes to LOIP Improvement Project Aim 16.1 '100% of decisions which impact on children and young people are informed by them by 2026.</p>
<b>Prosperous Place Stretch Outcomes</b>	Bringing forward the Open Space Strategy and Forestry and Woodland Strategy will support the delivery of LOIP Stretch Outcome 15 - addressing the nature crisis by protecting/ managing 26% of Aberdeen's area for nature by 2026.
<b>Regional and City Strategies</b>	<p>The Evidence Report will support the Aberdeen Local Development Plan 2028 through providing more information on the content of the Plan and ensuring better evidence based policies. It will ensure Aberdeen is an excellent place to live, visit and do business.</p> <p>The Evidence Report makes reference to many regional and city strategies. The Regional Economic Strategy, NHS Strategies and Plans, the LOIP and Locality Plans, Local Housing Strategy and the Regional Transport Strategy are a few examples. This ensures that these and all other such strategies</p>

	can be taken into account in preparing the next Local Development Plan.
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## 9. IMPACT ASSESSMENTS

Assessment	Outcome
<b>Integrated Impact Assessment</b>	An assessment has been completed and no medium or high negative impacts have been identified that would require mitigation.
<b>Data Protection Impact Assessment</b>	Not required.
<b>Other</b>	Not required.

## 10. BACKGROUND PAPERS

- 10.1 Full Council Report CR&E/24/187- Aberdeen Local Development Plan 2028 Evidence Report. July 3 2024.
- 10.2 Scottish Government Local Development Planning Guidance  
<https://www.gov.scot/publications/local-development-planning-guidance/documents/.....>

## 11. APPENDICES

- 11.1 Aberdeen Local Development Plan 2028 Evidence Report (Appendix 1)
- 11.2 Draft Strategic Flood Risk Assessment (Appendix 2)
- 11.3 Aberdeen City and Aberdeenshire Retail Study (Appendix 3)
- 11.4 Aberdeen Play Sufficiency Assessment (Appendix 4)

**Appendices 1, 3 and 4 can be accessed here -** [Document Aberdeen Local Development Plan - Evidence Report - 2 July 2025](#)

## 12. REPORT AUTHOR CONTACT DETAILS

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