

Main Issues Report: Responses to Comments Received

The Aberdeen City and Shire Strategic Development Planning Authority (SDPA) published a 'Main Issues Report' (MIR) in October 2011. The consultation period lasted for 13 weeks and closed on 6 January 2012.

A summary of responses to the consultation was presented to the SDPA at its meeting in March 2012 which was subsequently published on the SDPA website (<http://www.aberdeencityandshire-sdpa.gov.uk/nmsruntime/saveasdialog.asp?IID=958&SID=38>).

The responses received were used to inform the content of the proposed strategic development plan (SDP). This document provides a response to the issues raised in that consultation and is presented using the same structure as the MIR itself.

One of the challenges encountered by a number of those responding to the consultation was that they were unfamiliar with the content of the current structure plan and a lot of suggestions were made which related to matters already addressed in the plan (and hence not emphasised in the MIR). This is one of the challenges of reviewing an existing plan under the new development plan process.

Responses which welcomed the content of the MIR have generally not been highlighted below but were welcome and were captured in the earlier consultation report.

1 – Introduction and general comments

Comments welcoming the quality, format and clarity of the MIR are welcome, along with appreciation for the consultation events. The consultation was 13 weeks long so there was adequate opportunity for community groups to respond, even with an early January closing date.

It is recognised that the online form was not very user-friendly. A better form will be used for the consultation on the Proposed Plan.

The MIR was prepared with the input of a range of individuals, businesses and organisations. ACSEF was just one of these. Local views are important and these need to be captured in development plans so that they inform decision-making on individual applications. Local development plans are the best way of capturing issues specific to particular communities.

The SDP starts the next cycle of plan-making in Aberdeen City and Shire. Recently adopted local development plans were prepared to be consistent with the structure plan.

Economic growth is a focus of the plan because that growth can move the area in a more sustainable direction. Renewable energy, electricity transmission and carbon capture and storage all create investment and employment as well as reducing emissions of gases responsible for climate change. 'Steady-state' economics is not incompatible with growth at a local level.

Forward planning is challenging in the current economic climate but that is not a reason not to do it. The current climate makes it even more important that plans are robust enough to cope with a variety of scenarios. This area has been one of the most economically resilient in the whole of the UK since 2007, which suggests that less has changed here than in the rest of the country.

2 – Major influences on the strategic development plan

Widespread support for the identification of ‘supporting development in challenging economic times’ and ‘responding to the challenges and opportunities of climate change’ as the main issues was welcome. A number of other issues were mentioned which are already highlighted in the current structure plan such as sustainable development, the conservation of finite resources, the importance of Energetica and the need to conserve our high quality environment.

The suggestion that in harsh economic times less ambitious plans may be more realistic fails to recognise the different economic context in Aberdeen City and Shire (not immune but considerably more robust) and the fact that less ambitious plans would have serious social, economic and environmental consequences for the area. The SDP is a long-term strategic plan which looks forward to 2035. Short-term economic challenges may influence implementation in the short-term but will not last and should be seen in the context of longer-term objectives.

Sites to meet the plan’s allowances are identified in the local development plans rather than the SDP itself.

It is the SDP itself rather than the MIR which is required to contribute to sustainable development and Climate Change Act emissions reductions. The MIR focuses on those things where changes are proposed rather than presenting a draft plan. Issues of energy security are addressed in the MIR but more fully in the SDP itself. This is one of the challenges of preparing a MIR rather than a draft plan and thought will be given as to how this could be better communicated next time.

There isn’t a disconnect between the two issues and the rest of the MIR as they largely drove its content and the way individual topics were addressed.

Climate change is a significant driver of policy at UN, EU, UK and Scottish Government levels. It is not possible for the SDP to reject this, not least because of its legal requirements under the Climate Change (Scotland) Act and the Planning etc (Scotland) Act. It cannot be seen as a secondary consideration.

It is agreed that high quality sustainable design and places are critical to the implementation of the plan. The structure plan already attaches a high level of importance to these issues.

The vision of the plan will not be achieved without development and it would not be appropriate to fail to take reasonable steps to facilitate the delivery of the plan.

'Giving with one hand and taking with the other' is not a contradiction but a direct consequence of the need to prioritise in the current economic climate. Support is provided, for example, by proposing to delay the requirement for carbon neutrality, not increasing the requirement for affordable housing and the approach to the provision of new infrastructure through the strategic transport fund.

It is agreed that the Westminster and Scottish Governments must support development in the area.

Suggested documents will be taken into account in the Proposed SDP.

The delay to the AWPR has been regrettable but it is critical to the future to the development of the area.

Efficient use of land is vital to the delivery of the strategy of the plan. Scottish Planning Policy requires that prime quality agricultural land should be avoided where possible but it is very unlikely that all 'productive' land can be avoided.

It is agreed that the plan should continue to prioritise city and town centres for retail development.

The current structure plan was able to take into account the implications of the Planning etc (Scotland) Act, SPP and NPF2 (in draft) so the changes required are more modest than would otherwise been the case.

Aberdeen City and Shire doesn't have the capacity within existing infrastructure to support the level of growth envisaged within the plan so the challenges for the development industry in financing projects need to be recognised and addressed. The strategy of concentrating growth in the strategic growth areas is designed to facilitate the delivery of the required infrastructure.

Quality development and high quality infrastructure is essential if the area is to be able to attract the talent to address existing and future skills shortages and allow the economy to grow. This requires a long-term view to be taken.

A range of costs can be passed onto future generations as a result of decisions made today (economic, financial, social and environmental) and it is important that all of these costs are taken into account, as well as the lost opportunities that can result from particular decisions.

3 – Format

Widespread support for the format of the existing structure plan and proposed amendments is welcome. Graphic design suggestions will be taken into account for the Proposed SDP.

The Key Diagram is a reflection of the need to be explicit about how the plan should be implemented in the two council areas. The Proposed SDP has a new map / diagram but the importance of clarity for the two council areas remains. More detailed maps are provided to focus on particular areas of change.

Implementation of the SDP will be through local development plans as well as actions by a range of public sector bodies and private sector businesses. The Action Programme published alongside the Proposed Plan will clarify what needs to be done to put the plan into practice.

The approach of the current structure plan was to provide appropriate choices at the local development plan level in terms of their implementation of the plan. It is not appropriate for the SDP to take this discretion away unless there is a clear case for it.

The structure plan contained significant elements of policy material as well as its spatial strategy and clarity around targets. The level of policy prescription is considered appropriate and no examples have been provided where greater clarity is required.

4 – Vision and spatial strategy

Widespread agreement that the current vision and spatial strategy are appropriate for the SDP is welcome, particularly when the current focus should be on delivery.

The maintenance and enhancement of ecosystem services is important and amendments have been made which seek to reflect the important roles played by different land uses.

Development proposals are not considered in a vacuum but by law must be determined in accordance with the development plan unless material considerations indicate otherwise.

Support for Energetica, science parks, development around the airport and improved road and rail links are noted. The need for a sea link along the coast is more of an issue for the Regional Transport Strategy than the SDP.

It is agreed that quality of life and the environment are critical to the future success of the area. Being a desirable place to live is very important but growth has to be accommodated in the most sustainable way possible. The plan does not promote 'urban sprawl' but the development of high quality sustainable mixed communities.

Vision

Rather than move the date in the vision back every five years when a new plan is produced, it is now proposed to remove the date. The inclusion of a date indicates a target (which would be continually pushed back at each review) which was not intended.

Suggestions were made as to how the vision should change but these tended to add to its length without significant benefit. Support for particular types of development (such as renewable energy) and sustainable location / design are contained elsewhere in the plan and it would not be appropriate to repeat these in the vision.

This applies to proposed references to the city centre as well, where stronger language will be included in the text of the plan.

Support for a more sustainable and inclusive society is welcome. These were covered in the MIR, in terms of spatial strategy, policy and individual proposals but are more fully expressed in the Proposed SDP itself.

The plan needs to be read as a whole and individual proposals need to be seen in that context as well. Road improvements are part of the solution, not the solution in and of themselves.

Spatial strategy

Support for the current spatial strategy is welcome.

Levels of brownfield development are informed by an 'Urban Capacity Study'. There is already a generous supply of greenfield land for development and there is no justification for a mechanism to increase this further. The plan is reviewed every five years and such issues can be addressed through the review process.

It is recognised that renewable energy projects can support diversification and regeneration in rural areas. This is supported by the plan but was not a focus of the MIR.

The delivery of the AWPR is vital to the future development of Aberdeen and Aberdeenshire. It is not appropriate to develop a strategy which assumes it will not be delivered just because it has been subject to legal challenge. It is supported by both councils, the Scottish Government and a significant majority of the population of the area.

The level of growth appropriate in individual settlements in the local growth and diversification area (such as Newmachar) is a matter for the Aberdeenshire Local Development Plan, taking into account the strategy and objectives of the SDP.

The plan recognises the importance of Fraserburgh and the need to revive its economy. The plan does not limit the growth potential of the town but reflects the challenges and opportunities it faces, focusing on the need for regeneration. Regeneration funding is available to Fraserburgh through Aberdeenshire's 'Framework for Regeneration' and associated action plans. It is not proposed to change the strategy as it applies to Fraserburgh.

A number of responses suggested extending the coverage of strategic growth areas to include particular settlements or sites not currently covered. The current structure plan identifies the extent of the strategic growth areas in general terms but provides some discretion to the Aberdeenshire LDP to define which settlements fall within the area. It is not proposed to remove this discretion in the SDP. However, a number of areas are clearly currently outwith the scope of being included within one of the SGAs - these include Edzell Air Base, Westhill, Kemnay and Park Quarry (Drumoak). The SDP does not prevent development happening in such locations but does impact

on the scale of growth which might be appropriate. The strategy is only a few years old and implementation is only just commencing in full now that the two local development plans have been approved. It is too early to start changing the strategy without sound justification. The strategy focuses strategic growth in a limited number of places so that public and private sector investment in schools, community facilities and transport infrastructure can be coordinated and concentrated. Spreading growth too thinly would have a significant impact on the deliverability of the infrastructure required to service it. The strategy also directs strategic growth to locations which provide clear opportunities to encourage people to use public transport which can be provided in an efficient way. Diluting that strategy at this time would be detrimental to the delivery of the plan. The SDP is reviewed every five years so there will be opportunities to consider the strategy again in future years.

Edzell Air Base – previously in use as an air base the site received a large allocation in the Aberdeenshire LDP as part of the local growth and diversification area. However, the site is remote from the A90 (even if the strategic growth area did extend to the border with Angus) and the provision of public transport services to the site which would be both attractive and efficient is unrealistic. Considerable development would be required to deliver the necessary infrastructure but it would be remote from services and facilities. The strategy of the plan is to concentrate strategic levels of growth in the most sustainable locations and extending the strategic growth area to include Edzell Air Base would not meet this objective. The Reporters to the LDP examination strongly supported the concentration of development in Laurencekirk in order to benefit from its services and facilities and help to overcome existing constraints.

Park Quarry – a new settlement proposal in a quarry which is coming to the end of its extraction phase located on the south side of the River Dee on the South Deeside Road opposite Drumoak (11 miles from the city centre). The site will be restored to agricultural use after quarrying ceases. While the proposal is commendable in many respects (many of which were highlighted in the consultation response), there is no clear justification for extending the strategic growth area when housing allowances up to 2027 have already been identified in both LDPs (with this site rejected on a number of grounds) and no additional allowances are being proposed in the SDP. The site would be subject to significant infrastructure challenges, not least around transport given its location on the South Deeside Road. Scottish Planning Policy sets out the circumstances when a new settlement may be appropriate if it is justified by the scale and nature of the housing land requirement – the housing land requirement does not indicate a new settlement in this location is required as alternative sites have already been identified.

Kemnay – is some distance from the A96 corridor upon which the strategic growth area is based and the opportunities for encouraging public transport are considerably lower than within the corridor itself which was key to its identification. The secondary school roll currently exceeds the school's capacity. Diverting infrastructure

investment away from the Blackburn – Inverurie corridor would not be consistent with the plan's vision, spatial strategy and objectives. Inverurie already has a station and one of the plan's proposals is for an additional station at Kintore, the opportunities to maximise use of the railway were important factors in generation of the spatial strategy for the plan.

Westhill – has grown significantly over the last 20 years, both in terms of households and employment, but such growth does not, in itself, justify further expansion. The town is subject to a range of constraints including transport and education capacity as well as being physically constrained to the east and west by pipelines. In addition, opportunities have been identified in close proximity to Westhill to the west of Aberdeen so there are already significant opportunities for residential and commercial development within a distance of only a few miles.

Aberdeen City Centre was identified on the structure plan Key Diagram and will be in the strategic development plan as well.

Potterton – Aberdeenshire Council decided during the preparation of their LDP to exclude the settlement from the strategic growth area and this was supported by the Reporters at the recent LDP examination. Nothing has changed which would indicate that the SDP should take a contrary position.

Stonehaven is already part of the strategic growth area and the scale of growth in that town is a matter for the Aberdeenshire local development plan, taking into account the strategy and objectives of the SDP.

5 - Sustainable economic growth

Housing requirement and allowances

Acceptance of the proposed update to the housing requirement and that the current allowances are adequate to 2035 is welcome.

It is the role of local development plans to allocate site for housing at an appropriate density, with proximity to railway stations one of the important considerations.

The requirement no longer accounts for almost 5,000 demolitions in regeneration areas in Aberdeen City and this has had a significant impact on the housing requirement proposed for the SDP. Allowances for the period 2017-2027 are on top of the existing supply in 2011 and the allowances for the period to 2016 – providing a generous supply on top of the housing requirement in this period.

Some have questioned the need for such significant rates of new housing over the plan period. Although completions have declined over the last few years due to the financial crisis, they are projected to increase again in the next few years. The HNDA is not based on recent levels of population growth continuing at the same rate over the next 23 years, it is based on a more realistic scenario. It is not true that developers can't sell houses, new house building in Aberdeen City and Shire is considerably higher than the Scottish average. Most new housing is required to

house the existing population rather than to cater for an increase in population due to in-migration but jobs growth is forecast over the next 10-15 years.

No evidence is given to support the need for an increase in housing allowances other than 'GRO projections' and 'increasing demand'. However, the Housing Market Partnership has confirmed that the HNDA remains based on realistic expectations of future household and population growth in spite of more recent 2008 and 2010-based projections. The allowances contained in the plan are of a scale which enables the plan to be robust over the medium to long-term even with higher levels of growth than those foreseen in the plan – because a generous supply of housing land has been provided for. Increasing allowances to 100,000 would have significant infrastructure implications beyond those that the development industry is currently facing. Flexibility was built into the previous plan through a generous supply of housing land. That supply is still generous. Monitoring over the next five years will ensure that all available evidence is fed into the next HNDA and informs the next review of the plan.

It is not accepted that there is a significant qualitative and quantitative backlog in the housing land supply. Land is provided for affordable as well as market housing.

There is only one housing requirement in the existing structure plan and there will only be one in the SDP. Schedule 1 contains the generous allowances made to meet the requirement.

While delivery of housing is important (as evidenced by the targets in the plan, making it clear that sites are required to deliver units within a particular plan period would mean that allowances would need to be reduced because they currently provide a generous supply of housing land and the structure plan is clear (as will the SDP be) that they will not all be built in a particular period. This is not the outcome being sought by the respondent.

The Portlethen to Stonehaven strategic growth area already identifies a further 1,000 units for the period to 2035 and there is no realistic basis to increase this further at the current time. Monitoring of completions over the next five years at Chapelton of Elsick will inform future reviews of this plan.

The proposed SDP continues to provide considerable scope for small-scale expansion for smaller communities and no change is required to deliver this.

Local housing strategies will be emphasised as important in the delivery of the plan.

Available evidence of completions over the last five years provides no support for changing the balance between the two housing market areas. However, monitoring will continue to ensure that the balance between the two housing market areas is appropriate.

Employment land

The supply of employment land was not identified as a main issue so received limited attention in the MIR but that did not indicate it would not receive the same prominence in the SDP as it had in the structure plan. Regular monitoring is carried out and significant sites have come through the structure plan and two local development plans this year. Mixed-use sites are designed to integrate residential, employment and other uses through masterplans.

Population and household growth

The population of the SDP area in 2011 was around 23,500 higher than it was in 1996. However, the population fell for several years after 1996 before rising again.

The housing market area boundary does date from the early 1970's but the DTZ study of 2007 didn't identify a significant change during that period until data zones were used to try to build up an area. Following that study it was decided that no change would be made but that the results of the 2011 Census would inform the next review of the boundary. This decision was based on the fact that the observed changes were not significant, continuity of boundary had numerous advantages and there was no appetite for change within the development industry. The development appropriate to Catterline would not be determined by the Housing Market Area it is in.

The structure plan explicitly refers to the needs of the Gypsy/Traveller communities and it is expected that the SDP will continue to do so.

The HNDA is the main forum to debate future population and household growth scenarios. It was 'robust and credible' and has informed the MIR and Proposed SDP. That document was published alongside the MIR and contains the justification for the scenarios chosen.

The Housing Land Audit will monitor the effectiveness of housing land. Because generous allowances have been provided, it is not anticipated that additional sites will be required – this is one of the reasons a generous supply is required in the first place.

The allowances provide a generous supply of housing land and are robust enough to cope with higher levels of growth than anticipated by the plan. There is no justification for making LDPs add a further level of generosity on top, this would not be in line with Scottish Government policy.

It is agreed that quantity must not be at the expense of quality, which is why the current structure plan and future SDP place such a high priority on the quality of new development, including the provision of appropriate infrastructure.

A working group was established in late 2011 with representatives from the SDPA, SNH, SEPA, Scottish Water, Dee Salmon Fisheries Board and Aberdeenshire Council to look at water abstraction from the River Dee. This work concluded that the growth to 2035 was unlikely to have an adverse impact on the integrity of the river. However, climate change (in the long term) may have an impact which needs to be investigated further, including possible mitigation measures.

Connectivity

Significant support for putting more emphasis on the transport network in encouraging economic growth and the role of Aberdeen Airport are welcome.

Ways of reducing the need to travel and encouraging walking, cycling and public transport are central to the plan in both its spatial strategy as well as its policy material. A strategic cycle network will help make these connections for longer journeys.

Reducing congestion has an important role to play in improving air quality. The construction of the AWPR enables development closer to the City where walking, cycling and public transport are potentially more attractive choices.

The plan focuses on the importance of digital connectivity as well as transport as both are vital.

The role of the SDP to provide a strategic framework for the development of Aberdeen City and Shire. It is not the place for detailed wording of policies on level crossings, however important that might be. In the same way, it is not the place for details of airport safeguarding, although the principle is mentioned in the current structure plan and will be carried forward. The airport will be identified on the strategy map.

Upfront funding of infrastructure by the public sector is actively being explored but comes with considerable challenges.

Pipelines do play an important role and their use can vary over time. The MIR identified one potential use (transporting CO₂) but there can be others. Pipelines are safeguarded under Health and Safety legislation and through local development plans.

The importance of mixed use development was emphasised in the structure plan and it is proposed that this remains in the SDP.

Development is required to mitigate its transport impacts. Hundreds of millions of pounds is being spent on the transport infrastructure in the area and the contribution of new development needs to be seen in this context.

The delivery of the AWPR is important to the strategy of the plan and was factored into the strategy of the current structure plan so it does not require amendment at this stage.

The delivery of development in particular locations is a matter for local development plans in the context of the strategy set out in the SDP.

Nestrans is refreshing the Regional Transport Strategy alongside the SDP to ensure the two documents remain consistent.

Road, rail and airport infrastructure are all important to the future prosperity of the area, as well as actions aimed at encouraging people to walk, cycle and take public transport. Climate change emissions are one of the factors which is central to the strategy of the plan but that cannot mean that people are prevented from travelling longer distances for business or leisure.

Digital infrastructure

There was overwhelming support for the rollout of high-speed broadband throughout the area. It is agreed that the SDP should provide strategic direction to this process and it is welcome that some developers are already integrating such technology into new developments. It is agreed that it can encourage flexible working and reduce transport emissions and congestion. The SDPA are working with partners to influence infrastructure investment decisions but there is also a need to encourage developers to build high-speed broadband enabled homes which are fit for the 21st Century (which enable much faster speeds than retrofitting existing homes).

Retail

It is agreed that the city centre must continue to be supported, both protected and enhanced to meet the needs of businesses, residents and visitors alike. . Support for the existing structure plan's retail position is welcome.

Proximity to the AWPR is not a good justification for out-of-town retail when the clear priority must be on the city centre, while facilitating retail uses at a scale appropriate to existing centres in the hierarchy and mixed-use proposals on a neighbourhood scale.

Other

A range of suggestions were made to the MIR as to other changes needed to the current structure plan to support sustainable economic growth but these are either already covered in the structure plan or issues for the regional transport strategy, LDPs or implementation.

6 – Supporting development

A range of suggestions about how to support were suggested in response to the MIR, many of which extend beyond the remit of the SDP (such as tax measures). Clarity, flexibility and a pragmatic approach to implementation were advocated as well as supporting community trusts and social enterprise. A generous supply of housing land was also advocated as well as flexibility in the plan's strategy to support smaller sites with less significant infrastructure requirements – both of which are already provided by the plan. Incentivising mixed-use schemes was also suggested, or standing firmer against proposals which do not meet the highest standards. Doing more to explore innovative funding mechanisms was suggested to influence implementation of the plan. Some responses were clear that the plan should be neutral and enabling rather than encouraging and facilitating, with planning gain

discussed in an open and transparent way. Imaginative redevelopment of Aberdeen Harbour was suggested, along with a European Capital of Culture bid.

Strategic transport fund

[Consultation on the Strategic Transport Fund took place in parallel with the MIR consultation and the SDPA have already agreed a response.]

A variety of responses were received, with general support for the principal and questions over the detail of implementation and justification. It is recognised that transport assessment will still be required in some cases to address the local impacts of development.

A review of the guidance is required to bring it forward as part of the development plan and further engagement will take place to address remaining concerns over some of the details of implementation.

Timing of new developments and the AWPR

The continued commitment of the Scottish Government to the delivery of the AWPR is welcome, as is Transport Scotland's commitment to work in partnership in the intervening period. It is not possible to delay all development until construction of the AWPR has started but construction timetables do need to be taken into account when transport mitigation is proposed.

Affordable Housing

The provision of affordable housing is vital to the delivery of the plan's vision. When the funding situation improves (from the perspective of both the public sector and private sector) there will need to be a reassessment of requirements. Commitments by the private sector in excess of 25% in individual cases are welcome where they are otherwise in accordance with the plan. In the case where need has been identified at 38% in the HNDA, reducing expectations to 25% is already a significant change and reducing it further would not be consistent with the vision and strategy of the plan. While some responses sought 25% to be a maximum and some a minimum, around 25% is appropriate in the SDP with the ability for LDPs to vary the requirement on a site-by-site if necessary.

The need for creative solutions is recognised in the challenges of delivering affordable housing at the current time but the MIR did not imply that increased need for affordable housing had led to a fall in completions. The delivery of affordable housing is largely an issue for the two local housing strategies.

The importance of a range of house types, tenures and sizes is recognised as critical to the delivery of sustainable mixed communities.

The move away from one-year funding programmes for affordable housing is welcome as this will help delivery through the development plan.

Development charges are an issue being considered by the Scottish Government and were subject to a preliminary consultation earlier this year.

The importance of a robust framework for affordable housing is vitally important to ensure delivery of the plan. Indications are that there is likely to be a significant increase in new house completions in Aberdeen City and Shire over the next few years – up to and beyond what was seen in the period up to 2008.

Infrastructure fund

A variety of views were expressed on whether there was merit in rolling out a wider infrastructure fund. That is was something worth looking at was a commonly held view, particularly where the public sector were forward-funding the fund. Advantages were seen as speeding up the negotiation process for planning permission and increasing certainty over costs. Challenges were expressed about fit with current legislation and practical implementation and delivery. This issue can be explored further through the action programme with the Scottish Government and others.

Regeneration

The structure plan focused regeneration activity in Aberdeenshire and Fraserburgh was one of the areas it identified. A 'Framework for Regeneration' and associated action plans have been produced but implementation will take time and results cannot be expected overnight.

Regeneration Priority Area designation does not mean priority will be given to economic development proposals over environmental issues. The plan recognises that the issues in the southern area (in both scale and nature) are very different from those along Aberdeenshire's north coast and the text of the SDP should allay these concerns. The needs and opportunities of areas differ and enhancing the current environmental assets to focus on tourism could present opportunities in this area, as well as providing better access to services and employment.

A revised regeneration strategy is being developed by Aberdeen City Council which will emerge over the next few months.

7 – Managing resources efficiently

While the SDP is about principles, it is also about action to deliver our vision. It would not be appropriate to completely ignore the effects of the economic cycle. One of the key responses is around prioritisation where this is required.

Using land efficiently is recognised as important in the plan, with the redevelopment of brownfield sites and higher densities on greenfield sites both seen as vital to the implementation of the plan. While agricultural land will be lost to new development, there is no alternative if we are to grow at the scale envisaged by the plan.

Text has been included in the plan to reflect the importance of avoiding flood risk and the role of land use to climate change adaptation. The expansion of woodland cover has also been identified as having a role to play.

Renewable energy (heat as well as electricity) will be supported by the plan. This includes biomass and heat pumps as well as energy from waste. The plan recognises the importance of early engagement between developers if effective use is to be made of heat through district heating networks. While the setting of renewable electricity targets are not required by the Scottish Government, setting the target is designed to focus attention on the need for a significant increase in generation. The target is not expressed as a limit and progress towards it will be reviewed in future plans.

The importance of the green belt is highlighted in the SDP, with a focus on protecting the character and landscape setting of the city.

Additional sewage infrastructure capacity will be required in some locations but not of a scale which would require inclusion in the SDP. SEPA and Scottish Water, as Key Agencies have been involved in the preparation of both the current structure plan as well as the new SDP.

Carbon neutrality in new development

The challenges around moving to new development being carbon neutral are noted, particularly in the current financial climate. This is reflected in the MIR's suggestion that a flexible approach should be adopted rather than continue with the current target. It is also recognised that building regulations set nationally also have a role to play. However, the scale of development proposed in the plan, the lifetime of that new development and the urgency of emissions reductions makes it imperative that emissions are reduced as soon as practically possible in a local context. 'Fabric first' approaches are likely to be the most cost effective first steps and these should be taken as quickly as possible. Support for a common approach across Aberdeen and Aberdeenshire (if not Scotland as a whole) is welcome. A range of views were expressed as to target dates, with the view expressed that 2020 was challenging but realistic. Costs will only come down through large-scale implementation and this will require a push from the planning and building standards systems. A consultation on a review of building standards is anticipated in late 2012. Using the sustainability labelling mechanism does not duplicate work with building standards but focussing on carbon dioxide levels helps to priorities expenditure.

A variation on Option 1 rather than the preferred option in the MIR (Option 4) has been taken forward to the Proposed SDP, with a 2020 target date and the recognition that joint supplementary guidance may be prepared to help deliver this through the sustainability labelling mechanism.

Water efficiency

Support for water efficiency in new development is welcome.

Drinking water is not plentiful in Aberdeen City and Shire, with abstraction from the River Dee - a resource protected for its natural heritage value.

Water storage may be required at some point in the future but would present particular environmental challenges and be very costly. The appropriateness of such a solution will be explored further with partners in the context of the likely impact of climate change on the River Dee and inform future plans. However, water efficiency measures are likely to be more sustainable and cost-effective.

Water efficiency is not currently part of the building regulations in Scotland. In any case, Aberdeen City and Shire has a local challenge to deal with around abstraction from the River Dee.

General support for the use of sustainability labelling as a consistent mechanism to address water efficiency issues, with one standard across the SDP area being the preferred approach (if not across Scotland as a whole), including domestic as well as non-domestic buildings. Support given for the use of the gold standard from the start.

However, the proposed SDP has not specified how water-saving technology should be incorporated into new development, choosing Option 1 rather than the preferred Option 3.

Alternative fuels for transport

Reducing emissions from transport will improve public health but it is recognised that this is not the solution to congestion.

Hydrogen is one alternative that is currently being explored, with a focus on hydrogen buses rather than fuel cells.

The proposed SDP does support the deployment of alternative fuels (such as electric charging points) but is not specific about location. This is an issue being picked up by the refresh of the Regional Transport Strategy.

Managing our waste

Recognition of the importance of changing current waste management practice and the potential contribution of the SDP is appreciated. The Scottish Government see the planning system having an important role to play in facilitating this transition and a planning free-for-all will not deliver the required change. However, it is not possible to restrict the use of non-recyclable materials in the SDP.

The MIR and proposed SDP do not single municipal waste out but seek to plan for all waste. The foreword to the MIR emphasises the importance of waste management in the MIR as well as the space devoted to it – its location in the document is not relevant.

Considerable support for self-sufficiency (Option 2) was expressed, with the benefits this can bring, which is welcome. It is recognised that some waste will need to be transported outwith the area (due to the treatment processes required) and that some may enter the area. However, meeting our waste management needs locally as far as possible is the clear goal. The MIR sought to provide a positive perspective on waste management, there is no indication that 'letting the market decide' will deliver the investment required.

The particular challenges associated with the treatment of hazardous waste are recognised. The plan does not seek to prevent these being dealt with in appropriate facilities.

Widespread support for the approach to landfill is welcome.

Widespread support for the regional concentration of new waste management facilities is welcome. While it is recognised that site characteristics will be important, sites in or on the edge of settlements are likely to be suitable for modern waste management facilities, except where a rural location is required. It is agreed that cumulative impacts need to be taken into account when siting new facilities but this does not need to be highlighted in the SDP. No value is gained by identifying existing waste management sites in the SDP and setting out the types of facilities required is likely to be overly restrictive. Agree that site identification for new facilities can be helpful but no sites were proposed during the preparation of the SDP. It is recognised that transport other than by road is potentially beneficial, depending on the distances involved.

Widespread support for setting a clear framework at the regional level and letting LDPs implement it, either through site-specific allocations or otherwise. It is recognised that the views of local communities may make this challenging on some sites. The LDPs are not out-of-synch with the SDP, both SDP and LDP are reviewed on a rolling basis and new LDPs will be required to implement the SDP.

Although there was a general acceptance that this policy framework will encourage the move towards more sustainable waste management, those who took the view that the market should be left to get on with it without interference from planning did not agree. The SDP provides a positive framework without being too restrictive but it is recognised that confident and courageous decisions will be required to implement it.

Waste is recognised as a resource rather than a problem as well as having a potential role in the generation of renewable energy. The importance of waste minimisation is emphasised. A number of suggestions go beyond the scope of the SDP (such as funding, waste charging, increasing kerbside collections and the use of biodegradable packaging). The SDP does not limit waste management to the strategic growth areas.

8 – Proposals

The proposals contained in the plan are recognised for the support they give to the delivery of the plan and its spatial strategy. They are given explicit support as being in accordance with the plan. A new community stadium is supported by the plan but two possible locations were identified but the choice of site required justification.

Aiding investor confidence for waste management proposals is important but no such proposals have been put forward for explicit support in the SDP.

Existing Proposals

AWPR – The delivery of the AWPR is vital to the future development of Aberdeen and Aberdeenshire. It is not appropriate to develop a strategy which assumes it will not be delivered just because it has been subject to legal challenge. It is supported by both councils, the Scottish Government and a significant majority of the population of the area. It is agreed that it should not become a location for out-of-town retail development as retail needs to be supported in existing centres, particularly the city centre but also other existing centres.

Haudagain – Proposals have been put forward locally which have been accepted by the Scottish Government. While it is recognised that the proposals will have an impact to the local area, it is not possible to improve the junction without significant change to the adjacent areas. However, attempts have been made to minimise these impacts in the design of the proposals.

Third Don Crossing – A planning application has now been approved, although the ongoing legal action is noted. The SDP supports a third crossing over the River Don because of the relief it brings to existing crossings, the development it enables to the north of Aberdeen and the improvements at the Haudagain roundabout it supports. No indication exists that the proposal would be paid for other than locally, although the AWPR contract has been identified as a possible way of reducing the cost.

New stations – the plan will continue to support the possibility of opening of additional stations. Kintore is now a firm proposal but there is a need for the case for additional stations to be explored further and led by Nestrans in partnership with Transport Scotland and the two councils. Transport Scotland's position regarding new stations has changed over recent months which is helpful in this regard.

Strategic Rail Improvements – support for this strategic rail improvement is noted. Electrification will continue to be supported.

Airport Masterplan – Aberdeen airport plays an important role in the regional economy and is a vital link which needs to be supported. It is however important that efforts continue to be made to minimise the environmental impacts of the airport and this was the focus of the SDPA's response to the draft Masterplan 2012.

Community stadium – It is noted that planning permission has yet to be granted because a legal agreement is required before this can be done. Until the new

stadium is delivered it is proposed to retain both potential sites in the SDP because delivery on the currently preferred site is still subject to uncertainty. A possible new station in the south of Aberdeen will be considered by Nestrans and partners as part of their wider consideration of possible new stations. Aberdeen City Council are minded to grant the application on the site so are comfortable with the traffic impacts of the proposed development on the road network (with the mitigation proposed).

City Centre Masterplan – A development framework has now been produced and it is the implementation of this which is now important.

Electricity grid – SHETL timescales for the Peterhead – Rothienorman upgrade are noted. Leylodge is the closest Aberdeenshire community to the substation, although Kintore is the closest town. Figure 14 was supplied by Scottish and Southern Energy at the time of the MIR but will not appear in the final SDP anyway.

New proposals

Support for the inclusion of these new proposals is welcome. While it is agreed that the strategic transport interventions are of regional importance, the other proposals do have a much wider national and international significance. There is no value to be gained from not identifying projects of national significance in the SDP.

It is recognised that the SDPA does not control the delivery of these proposals. Rather than highlighting this in the plan itself, this will be clear from the action programme, including the sources of funding appropriate in each case.

Although the deployment of carbon capture and storage is ambitious, this project fits extremely well with the plan's vision and aims and should be supported. Although the Longannet proposal has now been abandoned, other projects in central Scotland have replaced it and the use of the existing pipeline to St Fergus is still likely to be attractive.

The challenges around the need for electricity converter stations in and around Peterhead will be reflected in the plan, along with the need for a strategic framework for the area to access capacities, design, scope for coordination and mitigation. While NorthConnect and SHETL disagreed with the need for a 'masterplan', there was a recognition that the projects have the potential to raise significant planning issues. The term 'masterplan' possibly implied a level of detail not originally envisaged in the proposal. The assessment of cumulative impacts through the EIA process will not give the required level of co-ordination in land use planning terms. A strategic framework is proposed as the means of addressing these issues, avoiding the complexities of business separation and competition law. A project to scope the strategic framework is currently underway with Scottish Enterprise and Aberdeenshire Council – this will involve engagement with all the known potential developers in the area. Scottish Natural Heritage will be integrated into the project as it moves forward.

It is recognised that the strategic transport interventions identified require further refinement in terms of detail but the need for them has been identified and is justified on the basis of the cumulative transport appraisal carried out with Nestrans and the two councils. The support of Transport Scotland in this process is appreciated.

Additional proposals

A range of additional proposals were suggested for inclusion in the SDP, some of a general nature such as 'job creation initiatives' and others more specific.

Support for an extension to the Peterhead electricity substation is given in the SDP in recognition of the role it can perform in transmitting renewable energy (particularly from offshore wind). Other onshore infrastructure to support offshore energy generation and transmission is also supported.

It is proposed that the importance of green networks should be recognised in the plan, particularly with reference to the implementation of strategic walking and cycling routes. However, further work is required to more clearly define the scope of work appropriate in a largely rural area in respect of a wider vision and spatial strategy.

The export of water from our ports is not supported because water sources in the area do not generate surplus capacity for export.

The allocation of land is a matter for local development plans in the context of the spatial strategy and objectives of the SDP.

The need for concerted action to improve the city centre is proposed in the plan and this includes support for pedestrianisation. The individual components are largely a matter for Aberdeen City Council and partners. The ACSEF bond proposal would appear to align well with suggestions made around envisaged delivery mechanisms.

The potential for combined heat and power, particularly when powered from renewable energy is already supported by the plan, not just in the Energetica corridor. Hydro-electric schemes are likely to be small-scale in nature but the plan does support renewable energy generally.

The plan has a clear focus on a sequential approach to retail within the plan area, with the city centre as the regional centre which must be supported. While retail uses are vital within new sustainable mixed communities, it is not appropriate to identify Loirston as a site for out of town retail use.

Rail – Reopening the Deeside line would be very expensive and complex given current uses (including as an active travel route). However, rail issues such as this are a matter for the Regional Transport Strategy.

Bus – The Ballater to Perth (Heather Hopper) service is outwith the SDP area. Subsidies for public transport is not an issue for the SDP. Park and ride sites are included in the structure plan and are taken forward in the SDP. Bus priority measures are identified as required under the additional projects identified in the MIR. Issues of bus ticketing are not for the SDP.

Active travel (walking and cycling) – the importance of strategic walking / cycling routes in the strategic growth areas is recognised on the Proposed SDP and is also being taken forward in the refresh of the Regional Transport Strategy.

Pedestrianisation in Aberdeen city centre is supported as a proposal by the current structure plan and it is proposed to retain this support in the SDP.

Road – A link from Inchgarth Road to North Deeside road or from the Netherly Road to the Slug Road would not be a strategic project. No need or funding has been identified for a junction on the fastlink at Chapelton of Elsick at the current time. In line with the current structure plan, it is agreed that STPR project 29 (A90 improvements through or around Dundee) would bring benefits to Aberdeen City and Shire and should be supported in principle in the text of the plan. Issues of congestion charging and car park charging are not issues for the SDP.

Projects not included explicitly within the plan would need to be assessed against the plan as a whole at the time they come forward to assess their acceptability. The plan will be reviewed every five years to ensure it is kept up-to-date.