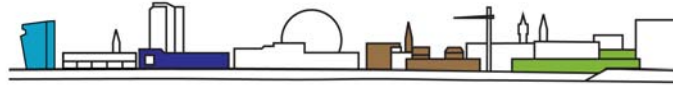


**aberdeen** local development plan

## Main Issues Report – Policy Topic Responses

Contents
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Page 2:	<a href="#">Consultation Process</a>
Page 10:	<a href="#">City Centre &amp; Retailing</a>
Page 21:	<a href="#">Design</a>
Page 32:	<a href="#">Green Belt</a>
Page 35:	<a href="#">Housing</a>
Page 43:	<a href="#">Infrastructure &amp; Developer Contributions</a>
Page 56:	<a href="#">Miscellaneous</a>
Page 62:	<a href="#">Strategy Housing Numbers</a>
Page 64:	<a href="#">Strategy</a>
Page 71:	<a href="#">Sustainable Construction</a>
Page 77:	<a href="#">Transport &amp; Accessibility</a>
Page 88:	<a href="#">Waste</a>
Page 93:	<a href="#">Environment</a>



**aberdeen** local development plan

**Main Issues Report – Consultation Responses**

Consultation Process

Responses relating to the overall consultation process were received from 24 different interests:-

- 18 individuals
- 3 community councils
- 1 landowner/developer
- 1 agency
- Scottish Government

Comment	Response
<p><b>Milltimber consultation event:</b>-Hard to hear the main speaker most of the time. Microphones are needed at meetings like this (for audience questions as well).</p> <p>The presentation given at Milltimber may have been less of a shambles had you taken into consideration the uproar your proposals would have in the small community. The acoustics in the room were less than perfect which resulted in few of us being able to hear what was said.</p> <p>The meeting was very badly organised. It was held as part of an information evening but it should have been held as an evening on its own. The main problem was that no microphones were available which resulted in a significant part of the Council presentation and comments from the floor being missed.</p>	<p>We accept that the Milltimber meeting did not go as well as we intended. It was one of the first events in our series of 10 across the city. Learning from that experience, we used a different format for the remaining events and these seemed to go much better. In future we will check venues more thoroughly in advance to ensure that better public address facilities are available if room acoustics are not great.</p>
<p>Surprised that developers were present at the meeting - gives the impression of Council support.</p> <p>Developers should not have been present at the exhibitions.</p>	<p>The new planning system aims to be as open as possible. Because of this we invited developers to the consultation events so that everyone would have the chance to speak to them on their proposals. This we feel is much better than planning officers and developers meeting without the</p>

Comment	Response
	wider community having an opportunity to see or hear what's being proposed or discussed, or to get their points of view heard. It's also useful for developers to hear directly from local people about issues that concern them.
Why was there no meeting in Kincorth?	Ten venues were chosen across the city, focussing on those neighbourhoods where most development change was being proposed. We discussed these venues with community council reps prior to making arrangements. There was a meeting in Cove/Loirston which was the nearest for Kincorth residents. We will continue to discuss prioritising venues with community reps in future consultation exercises.
<p><b>Mastrick consultation event:</b>  Consultation worked well - Event was held in a location within walking distance for most people who would be interested. The event was well structured. The format put everyone at ease and ensured people were comfortable participating. It also allowed everyone the chance to make as many points or ask as many questions as they wished. The consultation event was one of the best I have attended and those who organised and participated in it should be commended.</p>	We are pleased that the chosen format was considered a success.
The structure by which Aberdeen City Council have presented and informed the community is somewhat far from engaging or pleasing.	We are happy to consider how our engagement methods might be improved and would welcome positive suggestions. We feel that the methods we put in place were wide ranging and offered people many opportunities either to discuss issues with us or submit their views in writing or electronically. The way in which we carry out consultation on the Local Development Plan is set out in the Participation Statement which is published as an Appendix to the Development Plan Scheme (published March 2010). Here's a

Comment	Response
	<p>weblink:-  <a href="http://www.aberdeencity.gov.uk/web/files/local_develop_frame/local_development_plan_scheme2.pdf">http://www.aberdeencity.gov.uk/web/files/local_develop_frame/local_development_plan_scheme2.pdf</a>            When we get to the stage of submitting the Proposed Plan to Scottish Ministers we must also submit a report showing how we carried out consultation.</p>
<p>Consultation for huge policy changes must be improved - statements that statutory requirements have been fulfilled are not satisfactory. The process must enable people to be informed.</p>	<p>Our consultation programme far exceeded the statutory minimum requirements. Ten consultation events were held plus meetings with community council representatives, the Civic Forum, Land Use Forum, Youth Council, etc. fourteen media releases were made before and during the consultation period. All appropriate documents and response forms were available in public libraries and on the Council website. The consultation period was held over an eight week period, rather than the statutory minimum of six weeks.</p>
<p>I do hope that the Council will not reproduce responses in a narrow vertical column in a table of responses, as it has done previously. This reproduction renders what people have to say unreadable and is not acceptable.</p>	<p>We will give a full response to all the issues raised rather than itemise each single item. This should allow for everyone's representations to be read within a wider context and will hopefully give a fuller explanation of what we are proposing in response to issues raised.</p>
<p>Concern about the very limited time available to comment on a very complex and wide ranging document - Consultation period was during Community Council elections followed up by the run up to the festive season and this compromised our ability to make informed comment.</p>	<p>Our consultation was held over an eight week period between 16<sup>th</sup> October and 11<sup>th</sup> December, two weeks longer than the statutory minimum. We appreciate that new community councils were coming into effect at the beginning of the process. We held an earlier meeting with community councils in late September to discuss the nature and content of the consultation process. The Main Issues Report was in the public domain from the beginning of the last week in September 2009 when it was considered by the Council prior to be published. Extending the consultation period any longer would have led to it</p>

Comment	Response
	running over the Christmas and New Year holiday period.
<p>We understand that comments made by people attending the exhibitions will not be considered unless made in writing. This is wrong and negates reason for attending the exhibition.</p>	<p>We took notes of the main points raised by people at the consultation events and these comments have been given due consideration alongside all written representations. We told people attending these events that it would be best if they also submitted their comments in writing. This was for a number of reasons, including: 1) we couldn't guarantee to have captured all the views expressed at the consultation events; 2) we may have written the comments differently from the way in which the person expressing them may have wished; 3) submitting a formal response ensures there can be no misinterpretation of a person's view and ensures a direct response.</p>
<p>I submitted comments on paper but would have preferred to do it online or by email. The online system doesn't allow me to save the document and I am not prepared to risk losing my response if the system goes down part way through the input process. Please make it different in future.</p>	<p>We received comments on paper, online and by email. You are correct that the online form did not allow saving of comments prior to submission. We are going to use a system being mainstreamed by the Scottish Government for the consultation on the Proposed Plan. Unfortunately, this will also not allow the saving of comments. It will however save comments to the 'session'. This will allow respondents to take a look at the plan, make a comment about the plan, go back to the plan or maps and make another comment, and effectively build up a shopping list/cart of comments before submitting. The new system will be far more user friendly. We acknowledge the online form was not particularly user friendly and apologise for any problems experienced in making comments. When making your responses online, it would be safest to save them in a document first on your computer and then paste them into the form.</p>

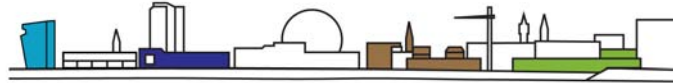
Comment	Response
<p>We (landowner) welcome the opportunity we have had to contribute to the consultation sessions in June and November by talking with local community representatives and adjoining landowners.</p>	<p>We believe there are benefits for all parties in this approach.</p>
<p>Concern that the ordinary citizens views are not being given much weight in developing the Local Development Plan</p>	<p>Everyone's representations are analysed and considered before any decisions are taken.</p>
<p>The conclusions of the Main Issues Report and the process leading to it appear, to me at least, to be very arbitrary and designed to provide a vehicle to put the proposals into the Local Development plan and out of the influence and control of the local population. The apparent absence of a process to reassess the points awarded to sites not presently deemed "desirable" but which could be influenced by the building of the AWPR would suggest that the proposals in the Main Issues Report are inexorable and not meant to be influenced by public opinion.</p>	<p>This is not the case. All options have been carefully considered and all comments analysed. The points system referred to, ie the sustainability assessment was just one tool used in determining which sites were deemed 'desirable'. Other factors included the Transport Framework and Strategic Environmental Assessment. Account was also taken of views expressed at an earlier stage in assessing development options, other information about sites and existing policy considerations.</p>
<p>The total amount of information received or available from Aberdeen City Council is huge and makes it difficult to keep up with and understand the process currently under review. A more reasonable and concise way should have been adopted to inform residents of what is being proposed, something in the nature of an executive summary with a bibliography.</p>	<p>It is difficult achieving a balance between giving enough information for people to take an informed opinion about options and overloading them with detailed information. The Main Issues Report covers a lot of ground in 49 pages. All the background information was made available on a CD and was published on the Council's website. The media releases we put out on a regular basis contained summaries and perhaps we could make these more widely available in future. We are happy to look at better ways of sharing information.</p>
<p>To gain public support for the local development plan we believe there needs to be more extensive public engagement on the detailed issues. As addressing all the issues moves to a greater level of detail we see the opportunity to make use of</p>	<p>Consultation events were held at two stages in the process so far, when discussing development options and following publication of the Main Issues Report. Community councils and others have been given a timetable for the next stages in</p>

Comment	Response
<p>community council meetings during 2010 to involve the public and channel feedback. This would require commitment by city planners and local councillors to a programme of events throughout the year that is properly advertised to get the necessary public participation.</p>	<p>preparing the Plan.</p>
<p>Councils should be genuinely accountable, selecting committed, able support staff and inform and involve the public - not just at elections.</p> <p>The excessive increase in the administration (and costs!) over past decades, with fewer well-informed and apparently dedicated staff, has led to the over 50% dissatisfaction rate amongst the public with the local Councils. Councillors seem to have lost touch with what residents want, deserve and need.</p>	<p>The Local Development Plan consultation process provides an opportunity for local people to express their views. Elected members are made aware of all the comments received and this will help them when they come to take decisions on the content of the Plan.</p>
<p>ADLP procedure states that 'full information' should be provided for sites presented for public consideration. I do not think that this condition has been met for your 'preferred' 500+ homes site at 9/11. The information presented at (<a href="http://www.aberdeencity.gov.uk/nmsruntime/saveasdialog.asp?IID=22580&amp;sID=9739">http://www.aberdeencity.gov.uk/nmsruntime/saveasdialog.asp?IID=22580&amp;sID=9739</a>) does not give enough information for consideration and should therefore be removed as it does not meet the requirements stated for the ADLP review.</p>	<p>We have made all the information we have about site options available for anyone to look at, so we are not sure what more could be done. We do not understand how the removal of information from the website would assist.</p>
<p>The way that this consultation is being undertaken allows developers to propose other sites with inadequate consultation with the public. No other sites should be considered without reissuing the entire consultation. I am concerned that this consultation allows suggestions to be made without adequate scrutiny by others.</p>	<p>All development options have been made available for public scrutiny. Those which were submitted at a late stage in the consultation period have not, however, been subject to the same degree of scrutiny as those submitted at an earlier stage. We will emphasise to elected members that if they wish to support any of these later options then there may need to be further opportunities for wider public examination of these proposals.</p>
<p>Councils should be accountable and</p>	<p>All comments are considered</p>

Comment	Response
<p>follow fair and democratic procedures. Councils should consider the views of general public regarding housing/transport etc and not only multi-national businesses.</p>	<p>regardless of who makes them. We will publish our responses to the issues raised by respondents.</p>
<p>While public consultation is welcome and laudable, simply setting out a large number of options put forward by developers does not constitute proper consultation.</p>	<p>The consultation process was much more than suggested in this comment. All development options were assessed by planning officers and a view put forward as to which might be desirable within the context of the strategic land requirements of the city. This sometimes involved modifying site boundaries or eliminating some altogether. The overall strategy for development was also available for discussion.</p>
<p>There is no clear evidence that these sites have been proper consideration by the Local Plan team and many of them should have been discarded (with reasons for doing so) before going to public consultation. The clear impression is that, having come up with the number of 36,000 homes, the easiest option to achieve this has been taken by inviting developers to put forward as many proposals as they wish.</p>	<p>The new planning system aims to be as open as possible. Discarding suggested sites without making our reasons available for public scrutiny would run counter to these aims. Under the system we have used, most of, if not all, the options are now on the table. We have explained which options we feel are desirable and which are not and we have explained why.</p>
<p>The document is well produced and the authors are to be congratulated on the excellent content and presentation of complex data. The council is to be congratulated on a very open approach to consultation.</p>	<p>Noted.</p>
<p>Your form really needs to include a 'don't know' section and/or more opportunities to comment per question as some of the questions do not permit a straight yes or no response.</p>	<p>We offered a variety of methods of submitting comments. There was no restriction on the amount of detail anyone could write on a response form.</p>
<p>It seems to me that information regarding all the possible options for development sites has not been readily available to the public in a digestible form. There would appear to have been many other such options that have not been visible without delving into the depths of</p>	<p>We have made all the information we have about site options available for anyone to look at either in a relatively concise form in the Main Issues Report or in full through the supporting documents.</p>



Comment	Response
<p>large documents. The results of this survey will therefore be skewed.</p> <p>This is further exacerbated by this webpage which is far from user-friendly (e.g. I lost the entire document when close to completion, by attempting to change a very small detail!). Only particularly persistent respondents are likely to have their voices heard.</p>	<p>We acknowledge the online form was not particularly user friendly and apologise for any problems experienced in making comments. When making your responses online, it would be safest to save them in a document first on your computer and then paste them into the form. We will improve the system for the next stage in the process.</p>
<p>The sites identified for housing in the proposed plan should be clearly informed by the consultation process on the Main Issues Report.</p>	<p>All comments made will be given full and proper consideration in preparing the Proposed Plan.</p>
<p>Thank you for consulting The Coal Authority on the Main Issues Report.</p>	<p>Noted.</p>



## aberdeen local development plan

### Main Issues Report - Consultation Responses

#### City Centre & Retailing

##### 1. Quantity and Source of Responses

1.1 There were responses from 54 sources. This comprised:-

- 37 individuals,
- 5 planning consultants/agents,
- 3 community councils,
- Aberdeen Harbour Board,
- Aberdeen City Council (Asset Management);,
- Chamber of Commerce,
- North East of Scotland Transport Partnership (NESTRANS),
- Aberdeen Cycle Forum,
- Aberdeen City and Shire Economic Future (ACSEF),
- Scottish Natural Heritage
- Tenants First, and
- One retailer.

##### 2. Planning for the City Centre – Comments

2.1 The importance of the City Centre was clearly recognised but there was concern about a perceived deterioration in the quality of the shopping environment and visitor experience in and around Union Street. There was a feeling that the City Centre doesn't match Aberdeen's aspiration to be the energy capital of Europe. There were particular concerns about vacancies in the west end of Union Street, and a lack of clarity about the nature and timing of pedestrianisation proposals and whether or not this was a beneficial idea. Issues were raised about the numbers of pubs and clubs and the impact this has on the City Centre. The need for improved connectivity and linkages around the City Centre was also highlighted. A strong desire was expressed for the City Centre to play a more positive role in Aberdeen's future and for it to become a more pleasant and attractive place. There was support for a plan-led response to this rather than to leave decisions to be taken on a reactive basis and there was support for retail policies which encourage enhancement of the City Centre. A need to put in place a clear plan for improvements was identified, with an emphasis on taking a joined-up approach which looks at the City Centre as a whole. There was support for a City Centre Development Framework and/or Masterplan to guide development.

## 2.2 Specific comments raised:-

- Need for a City Centre Masterplan which outlines a clear vision and shows ambition.
- Support Main Issues Report's preferred option of the City Centre being the main destination for retail, business and leisure activities.
- There's need for a City Centre Development Framework.
- Strongly support the development of a City Centre masterplan and supporting development framework.
- The importance of the social function of the city should be added to economic aspirations.
- A revitalised city centre is important for improving quality of life.
- City Centre is very disjointed and fragmented, and Union Square has made this worse.
- Need more integrated approach to development of City Centre.
- City Centre does not live up to the city's status as energy capital of Europe.
- Plan should aspire to a City Centre with high levels of walking/cycling and active travel opportunities.
- Policies should aim to build a stronger City Centre economy with a blend of mixed business, retail, leisure and hospitality use. Retail alone will not provide a strong City Centre.
- The need for improved linkages has long been recognised.
- Recognise the importance of green space in the City Centre.
- Recognise the importance of the City Centre as an important public space
- Need for a better mix of uses with more people living in the centre.
- Reduce Council tax to encourage young people's housing
- No reference to the evening and night-time economies and we need a City Centre which meets the full range of work and leisure activity for the entire population.
- City Centre should be the main focus for retail, business and leisure.
- Union Square will be a disaster for the city
- Support for Bon Accord masterplan.

### **Response**

The need for a clear plan and development framework which together set out a vision for the City Centre and demonstrate the policies and principles for delivering improvements has been strongly emphasised. The Local Development Plan will respond to this by setting out, in tandem with a City Centre Development Framework, policies and guidelines which recognise the key role the City Centre plays in the commercial, economic, social, civic and cultural life of Aberdeen and the wider north east. It is a regional centre providing a focus for employment and business interaction, it offers access to a wide range of goods and services, and it's a place where many people meet socially and choose to live and visit. It is vital for the future prosperity of Aberdeen that the City Centre is enhanced and promoted as a safe, attractive,

accessible and well-connected place which contributes to an improved quality of life. The City Centre's built and natural heritage, including its green spaces, also makes a significant contribution to its attractiveness and prosperity and this is recognised. The Local Development Plan and City Centre Development Framework will complement the Aberdeen City and Shire Economic Future's vision for the City Centre and will provide clarity on how this can be taken forward in a planning context. They will set out a framework of policies, guidance and advice which seeks to secure a sustainable pattern of development. This will be achieved through applying policies and clear guidance which positively promotes what can happen, and where. These policies, advice and guidance will recognise the different character areas which make up the City Centre and the mix of uses which contribute to its vibrancy and viability. They will deal with a wide range of matters including design principles, landmarks, tall buildings, public realm, linkages, servicing, streetscape, licensed premises, etc. masterplans, such as the already approved Bon Accord Quarter masterplan, may be required for other quarters. New masterplans will have to integrate with each other.

### 3. Union Street

#### 3.1 Summary of Comments:-

- Concern about impact of new development on vacancy levels on Union St.
- Revitalise Union St by providing incentives to provide desirable flats and shops (no more night clubs) to attract young and single people.;
- Restore Union Street as a prime shopping area with quality shops along its whole length.
- Upgrade Union St
- Liven up Union Street with more character and local businesses
- Union Street is tired.
- Union St (and surrounding streets) is dying with units closing down while there are the same units in all the centres.
- Union St is a fantastic architectural asset but is underutilised due to a disjointed city centre
- Subsidise retailers to use Union St.
- Need more interesting shops – too many chains.
- Encourage small shops.

#### **Response**

It is obvious from the responses to the Main Issues Report that there is widespread concern about the perceived deterioration in the appearance of the City Centre in general and Union Street in particular, especially the west end of the street. Concern was also expressed about the quality and type of retailing on offer. Union Street is recognised as the main spine of the City Centre. Local Development Plan policies, guidance and advice, together with the proposed City Centre Development Framework will pull together a number of initiatives aimed at improving Union Street as a retail and commercial hub within an improved environment. Policies will encourage the reuse of unused floorspace whether it is for retail or other supporting activities which introduce

vitality to the city centre. Bringing empty space into residential use is also to be encouraged where appropriate. Planning policies on their own cannot deal with matters relating to subsidies or other financial incentives to encourage occupation of empty property, but will support initiatives of any nature which contribute to meeting planning objectives. Planning policies which help create a more attractive City Centre will in themselves contribute towards encouraging investment in the City Centre. Enhancement of the City Centre however requires planning, working in partnership with other services, agencies and the private sector, to deliver results and this will be reflected in the City Centre Development Framework.

#### 4. Union Street Pedestrianisation/Other Traffic and Parking Issues

##### 4.1 Summary of comments:-

- Delay pedestrianisation until after AWPR has been delivered and its impact assessed.
- Pedestrianisation should be linked to other strategic transport initiatives
- Pedestrianisation won't work.
- Pedestrianisation of Union St will cause more congestion in the harbour area.
- Pedestrianisation would help if linked with improvements at Union Terrace Gardens.
- Pedestrianisation would be a significant benefit to business in the city centre
- Wary of pedestrianisation as it may cause traffic problems elsewhere and would stop people coming to the centre.
- Delay in implementing AWPR will have detrimental impact on efforts to pedestrianise Union Street and improve air quality
- Reduce volume of traffic will help revitalise the city centre
- A City Centre that is compatible with high levels of walking and cycling will be successful.
- The city centre is current dominated by cars which results in an outdoor realm that is unpleasant, noisy and polluted.
- City Centre is too fragmented.
- Not enough parking at Union Square
- Park and Ride is no use
- Take account of interests of disability groups when implementing improvements to streetscapes.

##### **Response**

Pedestrianisation and other transport improvement proposals are dealt with in the City Council's Local Transport Strategy approved in 2008. A substantial programme of improvements to the strategic transport network is already underway to support the future pedestrianisation of Union Street. The Aberdeen Western Peripheral Route will reduce cross-city and City Centre traffic volumes and other adjustments to the strategic transport network are necessary to accommodate the remaining traffic that will be displaced from Union Street. Improvements which have been completed to date include:

- College Street Corridor Improvements;
  - Market Street Corridor Improvements;
  - 20mph zone established in the City Centre;
  - Footway widening on the south side of Union Street from Bridge Street to Market Street; and
  - Introduction of the Car Park Guidance System (CPGS) in the City Centre.
- Improvements are also currently being developed in detail for the South College Street Corridor. Strategic transport network improvements are also currently being explored on the Berryden Corridor. The Council will continue to progress urban infrastructure projects aimed at removing pinch points throughout the City. Where such projects are implemented, the emphasis will be on securing further improvements that prioritise the benefits delivered to more sustainable modes such as walking, cycling and public transport use. Transport policies are designed to improve opportunities for cycling and walking and to assist in the improvement of air quality and the environment generally.

**Air Quality:** There are 3 Air Quality Management Areas (AQMA's) designated in Aberdeen where national objectives for nitrogen dioxide (NO<sub>2</sub>) and fine particles (PM10) are exceeded. One of these covers the City Centre and includes Union Street, Market Street, Commerce Street, Virginia Street and parts of Guild Street, King Street and Holburn Street. Road traffic is the main source of the elevated pollution levels in these areas a new Draft Action Plan to tackle this has been produced. This proposes establishing a Low Emission Zone in which the most polluting vehicles are restricted. Supplementary Guidance will be prepared on this issue as detailed in the Action Plan.

**Union Square:** Car parking standards will be set out in Supplementary Guidance which will be reviewed through the Local Development Plan process. Car parking at Union Square meets the requirements of the planning authority. The location of this major development close to the City Centre and integrated with the rail and bus station makes it highly accessible by a wide range of transport modes.

**Streetscape Works:** Appropriate engagement on a statutory and non-statutory basis is undertaken with the Disability Advisory Group when designing streetworks.

**Park and Ride:** Park and Ride facilities assist in reducing City Centre congestion. The development of further Park and Ride sites and routes will continue to make this option more attractive and effective.

## 5. Primary and Secondary Shopping Areas

5.1 A large proportion of comments responded to the question posed in the Main Issues Report which asked people to identify the primary shopping area. This question was asked to help identify where different policy approaches might be required to enhance retailing and other commercial uses within the City Centre. A variety of opinions were expressed but there was some overall consensus on the core areas (see below). Two people questioned the

significance of identifying primary and secondary areas in planning policy terms:-

Q: Where would you consider to be the primary shopping area in the city centre?

Summary of Responses:-

- Union St x4
- Union St and surrounding streets x6
- Union St and associated centres
- Union Street East End
- Bon Accord/St Nicholas & Union St between Bridge St and Market St
- Union St/Bon Accord/St Nicholas x2
- Bon Accord/St Nicholas Centres x2
- Bon Accord Centre x4
- Bon Accord/St Nicholas/Union Sq
- Bon Accord/St Nicholas/Trinity
- St Nicholas Centre/Bon Accord Centre and east End of Union Street
- Union St/Union Sq/Bon Accord/St Nicholas and Trinity Centre/The Greenx2
- Union Sq
- Union St/Union Sq/Bon Accord/St Nicholas and Trinity Centre but not The Green
- City Centre
- Peterculter
- Edinburgh
- Aberdeen
- Don't know x2

### **Response**

The Local Development Plan will identify primary and secondary shopping frontage areas. The purpose of this is to promote preferred areas where retailing should be retained, encouraged and enhanced as the main activity (primary frontages), and areas where higher proportions of other uses may be encouraged which complement retailing and thereby enhance vitality and viability (secondary frontages). These will be shown on a map in the Proposed Plan.

A specific issue was raised about controlling the number of pubs and clubs in the primary shopping areas. This will be achieved by continuing to apply the 'Location of Licensed Premises in the City Centre' policy which sets down the criteria used to determine planning applications for these uses. Separate controls are imposed through the Licensing (Scotland) Act 2005.

## 6. Union Terrace Gardens/Denburn Valley

### 6.1 Summary of Comments:-

- Development of Denburn Valley incorporating Union Terrace Gardens would better connect the city centre and the
- Develop Denburn Valley.
- Peacock proposal is better, especially if easier access is made with a pedestrianised

- current shopping provision and create a more attractive, greener, better-connected, safer city centre with a unique civic space for recreation, leisure and major events.
- The elevation of the current gardens and covering of the Denburn would allow the back of Belmont Street to be opened up.
  - Do something with Union Terrace Gardens
  - The potential contribution which the Denburn Valley Development could make to the region has been understated.
- Union St.
  - Need to have a design competition with criteria not dominated by retail requirements
  - Retain Union Terrace Gardens in their current state or enhance them without building over them or installing a car park underneath.
  - Why develop this space when there is an existing square at Castlegate?
  - Development must be done carefully.

### **Response**

Consultation revealed a variety of opinion about how best to improve the role of Union Terrace Gardens and the Denburn Valley. The City Centre Development Framework will set out the key principles that require to be addressed in any future proposed developments relating to the Denburn Valley.

## 7. Retail Policy Comments

### 7.1 Summary of Comments:-

- Exclude out of town/edge of town retail parks as these detract from the attractiveness of City centre.
- Adopt a sequential approach to assessing developments as set out in national policy, with city centres and town centres at top of the hierarchy.
- Need to state protection for and enhancement of local shopping centres.
- Object to an ad hoc approach to development.
- Provide facilities close to where people live.
- Large scale retail provision should fit existing retail hierarchy.
- Plan should set out a retail hierarchy including recognition of existing retail parks.
- Main Issues Report fails to consider role and function of district centres.
- There should be small shops within walking distance of all residents. Designated parking needed for disabled people and parents with children. Too many people have to drive to big supermarkets.
- Develop an Aberdeen character for retailing
- Need for a shopping study
- Encourage small shops
- There is an adequate amount of shops in Aberdeen.



- Need for a new centre.

**Response**

The Monitoring Report prepared along with the Main Issues Report advised making no change to the existing Local Plan policy stance of supporting the City Centre as the main location for major retail development and that developments should not detract from the vitality and viability of existing first, second, third and fourth tier retail locations in the hierarchy of centres.

Policies in the new Plan will reflect this and will give guidance on how the sequential approach to assessing proposals will be applied. The City Centre will remain the key regional centre for retailing and the preferred first choice location for major development. The important role of neighbourhood centres will also be recognised. Masterplans for new development areas will be required to make provision for appropriate retail opportunities close to where people live and thereby reducing travel.

Parking provision for disabled people and parents with children is provided in new developments.

Elements of the Aberdeen Shopping Study 2004, which informed the policies in the 2008 Aberdeen Local Plan, will be updated in due course but this does not prevent us in the meantime from maintaining appropriate and relevant policies which support national policy.

8. New Centre to West of Aberdeen

8.1 One planning consultancy, on behalf of a developer, has put forward a case for the Proposed Plan to make reference to a potential site for a new centre, to include a district shopping centre and other uses potentially including schools, community buildings, health centre, emergency services hotel, etc. They suggest a centre should be promoted in "the western suburbs where much of the new mixed use and industrial development is to take place." They argue this centre is needed to ensure that new expanding communities are well served and that their needs can be met locally. The centre should be located close to the AWPR junction.

**Response**

The settlement strategy does not include any proposal for a major new "centre" in one location to meet the needs of the expanded city population. The strategy seeks to enhance Aberdeen City Centre as the primary location for major retail, leisure, entertainment and cultural services. In terms of more localised or district level provision, new communities will be provided with retail and other services required to meet their respective needs with sites identified through the masterplanning process. These sites will be located and designed to ensure that the services are close to where people live and can be accessed by walking, cycling and public transport as well as by private transport. This will ensure a more sustainable form of development as new housing allocations are distributed across the city. The western areas, Kingswells and Countesswells, have been allocated just under 21% of all new greenfield sites. Bridge of Don has more than 36%, Dyce/Bucksburn almost 22% and Greenferns 7%. Masterplanning of Countesswells would for

instance, include provision of a local centre to meet its needs. West Aberdeen is also to be served by a new superstore development on a site on the Lang Stracht.

## 9. Comments on Specific Sites

### 9.1 Broadford Works

9.2 One respondent suggested that quality retailing should be provided at the Broadford Works site which is easily accessible from the primary shopping areas.

#### **Response**

A Design Brief exists for the Broadford Works. The site is identified for mixed uses, but primarily residential, although an element of local retail would be acceptable. Many of the existing buildings on the site will have to be retained.

## 10. Retail issues raised in the Areas for Growth

10.1 A number of retail issues were raised through comments relating to specific sites within the various Directions for Growth. These are summarised below:-

### 10.2 Areas A&B: Bridge of Don/North Danestone

#### 10.3 Denmore Road (Main Issues Report ref.2/15)

Ryden's on behalf of European Development holdings, object to the non-identification of this site for retail purposes. This objection is supported by Hermes FC and Hall Russell FC, who use the existing football pitches on this site. Replacement and upgraded football facilities are to be provided on an alternative (unidentified) site.

#### **Response**

Proposals for retail development will be assessed according to the sequential test promoted by Scottish Planning Policy. Another site, which has the benefit of unrestricted retail use rights, exists within the Denmore Road area (see below). The convenience shopping requirements of the new communities in the North area of the city will be met within the new development areas and will be identified through masterplanning exercises. Part of this Denmore Road site has also been identified as a potential location for a new recycling centre required to serve the wider Bridge of Don area. The need for such facilities was highlighted in the Main Issues Report. The bulk of the site is used as playing fields which should be retained.

### 10.4 Denmore Road

10.5 Development Planning Partnership, on behalf of Standard Life, suggests that the retail warehouse units at Denmore Road should be a preferred location for any new superstore developments in the north of the city. These units have open class 1 use rights

**Response**

The principle of retailing on this site has been established but any proposed redevelopment is likely to be subject to a retail impact assessment.

## 10.6 Murcar (Main Issues Report ref 2/18)

10.7 Halliday Fraser Munro on behalf of J& AF Davidson has submitted two options for the development of this land within the context of the North of River Don masterplan. Option 1 includes employment land and retail, and Option 2 includes housing, retail and employment land. They claim public support for the ideas.

**Response**

Sufficient land has been identified elsewhere to meet the structure plan employment land allocations on more sustainable sites. Retail requirements of new development areas will be met by allocating sites within the desirable housing sites through the masterplanning process. This will provide local shopping provision close to where people. No strategic need has been identified for retailing on the 2/18 site. This location would encourage car borne shoppers as the site is remote from any existing or proposed housing.

## 10.8 Area G: Deeside

## 10.9 The Waterwheel (Main Issues Report ref 9/07)

Objections were received regarding this site, one stating that the site should be released for development the other stating that only hotel redevelopment is suitable for the site. There were four supporting comments stating the site was unsuitable for retail development.

**Response**

This is a stand alone development which has no relationship with facilities in the existing settlements. It is over 600m from the edge of Bielside and around 750m from the edge of Milltimber. Because it is remote from existing residential areas and would generate much more traffic on North Deeside Road as consumers would use their car to travel to the retail element. It may also harm existing local shops in Cults and Peterculter that are more accessible to those communities. In a similar vein, the housing proposed for this site will be remote from the rest of the existing settlements. Because there are very few facilities in walking distance of the site, people would be inclined to travel in their cars. The refurbishment of the hotel would be acceptable given its existing use.

## 10.10 Area H: Loirston and Cove

## 10.11 Souter Head Road (Main Issues Report ref 13/05)

An objector felt this proposal would lead to the closure of existing retail facilities in the area but indicated that it might be of use to residents.

**Response**

We feel this is an opportunity for retail development subject to a satisfactory result from a Retail Impact Assessment regarding local provision in the surrounding area and a Traffic Management Report.

**11. Brownfield Site Proposals:-****11.1 Haudagain Triangle (Main Issues Report ref. 4/01)**

Aberdeen City Council's Resources Management welcomes the identification of the Haudagain Triangle for the provision of retail on this site by highlighting that there is no district shopping centre serving the Woodside, Middlefield and Northfield areas. However, one respondent has requested that the type of retailing should be controlled to avoid competing with the city centre. Another is totally opposed to the idea on the grounds that retailing here would exacerbate the traffic problems the road improvements are meant to alleviate.

**Response**

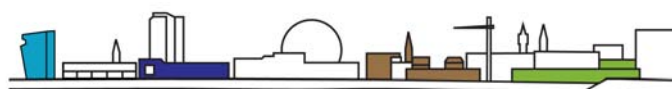
The site is currently occupied by housing but the Council has identified a preferred road scheme for improving congestion at the Haudagain roundabout. This involves removing the housing and building a link road through the site. The timing of this is dependent on Scottish Government funding and programming for the road works. No decision has, however, been taken on the form any retail development might take. Part of the site is also to be retained as urban greenspace. These uses will be included in the Proposed Plan which will identify this development opportunity.

**11.2 Summerhill (Main Issues Report ref. 3/08)**

Several comments were received stating that retail would be welcomed on this site. However, one objection was concerned about the loss of community facilities.

**Response**

There is a previously identified need for retail provision in this area, albeit on a different site. Any development on this site will have to mitigate any adverse impacts to infrastructure.



**aberdeen** local development plan

**Main Issues Report – Consultation Responses**

**Design:  
Summary of Responses**

<b>Comment</b>	<b>Total no. of respondents</b>	<b>Respondents generally supporting Main Issues Report.</b>	<b>Respondents generally opposing Main Issues Report.</b>	<b>Respondent offering advice/ comment only.</b>
Do you agree with the preferred approach to crating high quality design?	27	27	0	0
Design - Comments	26	8	2	16
Masterplanning process can provide greater public engagement	31	22	2	7
Kingswells Community Cards - Kingswells and Countesswells should be developed together to provide sustainable source of leisure in the countryside, and facilities should be master planned to optimise local resources.	471	471	0	0

## Summary of Responses

### Source of Responses

A total of **573** comments were received relating to design. These responses came from:-

- 46 individuals;
- 471 Kingswells Community Council Cards;
- Bridge of Don Community Council;
- Cults, Milltimber and Bielside Community Council;
- Cove and Altens Community Council;
- Mastrick and Sheddocksley Community Council;
- Culter Community Council;
- Scottish Government (including Transport Scotland and Historic Scotland);
- Scottish Natural Heritage;
- NESTRANS;
- The Scottish Environment Protection Agency;
- Civic Forum;
- Aberdeen and Grampian Chamber of Commerce;
- Aberdeen City and Shire Economic Future;
- Langstane Housing Association;
- Grampian Housing Association Ltd;
- The New Mosque and Community Centre Project; and
- 3 submitted on behalf of development industry/land owners.

### 1. Summary Overview of Responses

The comments received through the consultation exercise demonstrate there is strong support for Aberdeen City Council to increase the quality of design throughout the city. Of the comments received only one individual did not agree with the councils approach and justified this by citing a particular development deemed to have high quality design, which the respondent does not agree with. One other individual agrees to improving the quality of design in theory yet states that in practice this approach may have been used to permit development at a site where the respondent feels there is poor design quality.

#### **Architecture and Placemaking Policy (43 comments)**

Scottish Government, Langstane Housing Association, Grampian Housing Association, SEPA, Emac Planning, Aberdeen and Grampian Chamber of Commerce, ACSEF, Scottish Natural Heritage, Cove and Altens Community Council, Culter Community Council, The New Aberdeen Mosque and Community Centre Project and 27 individuals made comment relating to the architecture and placemaking policy.

The comments received advocate that the built and natural heritage of Aberdeen needs to be protected, enhanced, conserved and negative impacts of development need to be mitigated. Comments received include: research shows that attractive, vibrant cities are key to competitive regions, and high quality design is an essential requirement in a modern 21st century city region. To achieve good design clear and detailed policy and guidance must be produced. And one organisation stated that design is a material consideration and poor design is a reason to refuse planning applications, and those involved in making decisions about design need to be adequately skilled in doing so.

To ensure high quality respondents stated the character of an area must be assured, and the local style and history must be retained or reflected in new settlements, and the quality of materials used also needs to be considered. One comments received stated that Aberdeen City Council should make a stand against the bland, uniform, out of context developments seen recently and place emphasis on a variety of design.

There were also comments received from three organisations which emphasised green space within design alongside the build environment and the following elements were mentioned; SUDS, greenways, landscape fit, new planting, path and open space networks and habitat networks. There was concern from one individual representing two organizations that developing an architecture policy would not be an easy task, however, this was then quantified by stating that if design is looked at in a local and national context and Masterplanning is used then this will mitigate any concerns. One further origination stated that the Main Issues Report does not discuss the quality of materials.

## **Response**

The comments received reflect the desired approach outlined in the Main Issues Report. The built and natural environments of developments have to be considered along with connectivity for people, animals, and biodiversity amongst other elements. By considering these together there will be less wasted space, more integrated space and more attractive places. The local character of an area will be protected and enhanced, and developers will have to show how their design does this through the use of design statements and by adhering to policy and supplementary guidance.

The choice of materials is an essential element of design. The type of materials to be used is specific to the development, location and use. These issues will be discussed within the design statement and can be further developed at the masterplanning, planning brief and pre-application stage of a development proposal.

The development of the architecture and placemaking policy will look to Scottish Government policy 'Designing Places' and 'A Policy for Architecture in Scotland' to define the guiding principles of what is required to enhance design quality in Aberdeen.

## **Masterplanning Process (512 comments)**

The Masterplanning process received comments from the following: Scottish Government, NESTRANS, SHN, Cults, Milltimber and Bieldside Community Council, Civic Forum, Stewart Milne Homes, Cove and Altens Community Council, Mastrick and Sheddocksley Community Council, SEPA, ACSEF, Knight Frank LLP, 27 individuals, and 471 Kingswells Community Council Cards

The comments received relating to the masterplanning process support the approach as a tool for better public engagement. Of the comments received two individuals commented negatively about the masterplanning process and stated it is a way for the Council and developers to avoid having their detailed proposals challenged and scrutinised effectively.

The majority of comments support masterplanning as an aid to delivering well designed and integrated places in which to live and work, and one respondent commented that Masterplanning avoids the disparate and sporadic growth of the recent past. Sustainable transport and masterplanning were commented on by two organisations who stated transportation to and from large masterplanned developments alongside sustainable transport routes/links within these sites were vital. It was also noted that cycle and pedestrian infrastructure should link into these sites to ensure sustainable transport routes to the wider city.

Public participation and the masterplanning process raised a number of comments. The responses received stated that masterplanning should involve the existing local communities and it can be used to enable public



involvement at an early stage. Masterplanning can ensure proposals are more in alignment with the wishes of the existing community, and can support them by providing services which may be a lack at present. One comment received was that community councils should be allowed to comment on and object on the design of the development. Other comments state masterplans should also be presented in a way that encourages public participation, and which does not include planning terminology that ordinary people are unfamiliar with. There should be a transparent, open and honest approach to consultation from all parties; it should not be seen as a tick box exercise.

It was felt that masterplanning can lead to a variety of houses and landscaping on a development. The masterplanning process should help mitigate over-development of allocated sites which can cause problems for infrastructure provision, and in particular in relation to the provision of Sustainable Urban Drainage Systems (SUDS) and open space, or lack of, adjacent to water bodies. The masterplan process will help avoid requests to 'relax' SUDS requirements due to lack of space available on site. There were also areas for consideration/improvement mentioned. Plans should be more open with time for adequate deliberation, including proper and realistic costing. One organisation stated that masterplans should be required in the City for each of the major elements of infrastructure i.e. there would be a master plan for retail developments, schools, roads, waste, public transport, cycle & walking paths, medical and community facilities specifically linked to the local plan. Each needs to be accompanied by a project plan and a detailed funding plan.

Other comments relating to Masterplanning were:

- That statutory consultees are consulted at the scoping stage for any Masterplan to confirm any interests they may have in the site.
- The threshold for creating a master plan should be at 25 homes as opposed to 50.
- We recognise the advantages of masterplanning but also believe that Council's masterplanning process is cumbersome and may delay the release of planning consents. This needs to be reconsidered at an early stage. Early dialogue is required (in advance of Local Development Plan adoption) to ensure the speedy release and the start of development.
- Kingswells and Countesswells should be developed together to provide sustainable source of leisure in the countryside, and facilities should be master planned to optimise local resources.

## **Response**

The comments relating to the masterplanning process are welcome. Developments that are masterplanned are not exempt from the usual planning process and applications are subject to a statutory consultation process. Representation can be made to support, object or make comment on the proposals during the consultation process, yet it is expected that there will be an ongoing dialogue in the development of masterplans and the development within these sites. Public participation in the masterplanning process is very important and encouraged. The purpose of masterplanning is to ensure a development pays attention to such things as site planning, community integration, sustainable transport, ecology and landscaping amongst other things. There should be an ongoing dialogue between organizations, individuals and communities regarding Masterplanning.

It has been noted that jargon and planning terminology can be a barrier to understanding and we will try to present information as clearly as possible.

The promotion of sustainable transport, walkable communities and connectivity to existing routes or the creation of new routes is very important to establishing sustainable communities.

The threshold for masterplanning sites is 50 dwelling or more or developments on sites of 2 hectares or more. Developments or sites which fall below these cut off points may be developed using planning briefs. A planning brief is a document prepared by a local authority that sets out its guidelines and requirements for the development of the site.

Masterplans for all infrastructure developments are not necessary as there are specific policies within the local development plan covering retail developments, schools, roads, waste, public transport, cycle & walking paths, medical and community facilities. There are also the core path plan and local transport strategy which are updated. The Future Infrastructure Requirement Services group, made up from individuals from partner organisations such as the NHS, are involved in the local development plan and have outlined areas within the city where provision of their specific service is needed. The retail and city centre aspect are also covered in a development framework for the city centre which is being prepared. The development of masterplans, planning briefs and planning applications for each site will also ensure that all infrastructure and services necessary to the site and the surrounding area are considered.

## **Street Layout (2 comments)**

1 individual and NESTRANS made representation on street layout.

Two comments were received which specifically mentioned street design and layout. One individual commented that giving priority to pedestrians was not

the way forward and suggested the way to create safe and attractive systems for pedestrians and cyclists was for streets to be better designed and wider.

One organisation supported the policy as outlined in the Main Issues Report and the development of supplementary guidance. They stated that this approach should create streets as a place for all, and encourage sustainable transport such as walking and cycling. This approach should be used across the city, not just in lightly trafficked streets.

**Response**

Aberdeen City Council will adhere to the policy document, 'Designing Streets' published by the Scottish Government. This policy states that the hierarchy of movement, where pedestrians are given the highest priority, will be followed. Widening streets is not the only approach to take to make streets safer and more people orientated. Streets will become places where context, identity and connection are vital, and where people feel safe and welcome.

**Housing Design (6 comments)**

The topic of housing design received comments from 3 individuals, Civic Forum, Cults, Milltimber and Bieldside Community Council.

The comments received support the approach to increasing the quality of house design. Of the comments received half stated that what makes a place or a community attractive and have character is a variety in the design of housing and well incorporated greenspace. One individual made comment that what is needed is bigger houses with 4 and/or 5 bedrooms, while one organisation asked at what point the community can say no the design of housing.

**Response**

The positive response to raising the quality of design of housing is welcomed. It is noted that a variety of design and well placed, integrated greenspace are considered vital in making a place attractive to live in. Communities can comment on the design of housing at any point during the masterplanning process or planning brief development yet it is beneficial to make comments/representation early on in the process so that this can shape the developments. Design is a material consideration and during the determination of a planning application representations can be submitted on this. A variety of housing types is promoted by the plan and this may include a range of housing from flats through to large houses.

**Skyline and Tall Buildings Policy (2 comments)**

The Scottish Government and 1 individual commented on Skyline and tall buildings.

Two comments were received regarding the skyline and tall buildings policy, both support the approach outlined, and one goes on to cite an example of where development will break the skyline.

#### **Response**

The policy approach is to protect the vista and gateways views into the city and to ensure that tall buildings are situated in the correct place and do not damage the skyline of the city.

#### **Design Statement (0 comments)**

There were no comments received on design statements, however, as outlined in the Main Issues Report, we will prepare supplementary guidance on design statements.

#### **Design Review Panel (5 comments)**

1 individual, Cults, Milltimber and Bielside Community Council, Langstane Housing Association, Grampian Housing Association Ltd and Scottish Natural Heritage made representation on the Design Review Panel.

The comments received were overall supportive of a design review panel and it was suggested that members of the public, academics, architects, Historic Scotland, Architecture and Design Scotland and Scottish Natural Heritage could all be involved within the group, although one individual representing two organisations felt that there were some doubts to the practical workings of a local Advisory Group, yet did not explain their reasoning for this.

#### **Response**

The advice given on the make up of panel members of welcomed. The panel will cover both Aberdeen City and Aberdeenshire Councils and will consist of professionals from both the public and private sectors, chosen from areas of expertise relevant to each project. Panel member backgrounds will include relevant areas of knowledge such as Architecture, Urban Design, Landscape, Public Art, Community Engagement, Planning and Infrastructure. Each Panel will be composed of around 6 people, drawn from a pool of up to 20 members. The Design Review Panel will not supersede or prejudice the planning process, or any decision made by the planning officer or planning committee.

#### **General Comments (9 comments)**

8 individuals, Bridge of Don Community Council and British Airport Authority Aberdeen made general comments on design.

A number of general comments were received relating to design. One individual questioned whether there really is any emphasis on high quality or whether it's just what suits best and is most political, while another states that the approach may not stimulate architects to produce innovative and

sustainable developments, and that pastiche may be produced instead. Further comments questioned how local context would be considered and how the inefficient use of land and suburban sprawl would be stopped.

Three more individuals commented on the longevity of buildings, one stating that buildings should be well built and built to last, while one stated attention should be paid to good and proper maintenance of existing buildings. The demolition of existing buildings and the replacement with 'sub standard' infill must cease.

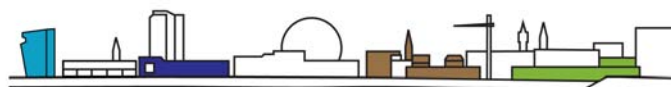
One person commented that design is personal and policy will not stop people expressing a difference of opinion on this even with policy in place. One other individual felt that although promoting good design is excellent neither Aberdeen City Council nor the developers have been able to demonstrate they have plans in place to do so.

### **Response**

Although the aesthetics of design are personal we will continue to promote the concept/ethics of good design. The focus on design relates to the overall design of places rather than the design features of specific buildings. The design principles of the Scottish Government's Designing Places will be followed. These state that successful places have a distinct identity, are safe and pleasant, are easy to move around in, have a sense of welcome, are adaptable in their use and are resource efficient.

Aberdeen City Council welcomes innovative and sustainable housing, office and industrial building design and we do not want developers to copy blindly or produce pastiche design but to use the elements of local design to inform new developments.

To ensure that new developments fit with the built and natural local context developers will have to adhere to/develop planning briefs and masterplans for sites. Masterplans and planning briefs will have to ensure that developments reflect the identity of an area through, for example, the careful positioning of buildings, enhancing or developing any built or natural features and other measures that will be detailed in the masterplan or planning brief for each site. These will also contain measures to stop suburban sprawl and the inefficient use of land as they provided a framework for the development of large areas of land and stop piecemeal developments from occurring.



## **aberdeen** local development plan

### **Equalities Action Network Consultation Event** **16 November 2009**

- Need to respect the historic character of the city and its important buildings
- Need to ensure better quality of development throughout Aberdeen but particularly in the city centre. Ibis Hotel in Shiprow highlighted as being an example of very poor quality development which ruins the good work done in extending the Maritime Museum on the opposite side of the street.
- Take full account of the interests of disability groups when implementing improvements to streetscapes.

### **Stoneywood Primary School Consultation Event** **16 November 2009**

- The character of Stoneywood should be maintained – in general the school is the focal point of the community but more facilities would be desirable, such as doctor and dentist.
- Several comments were made by members of the public that they were concerned that all design of new housing was becoming rather generic and does not resemble any relationship to the area at all. They wondered what the council could do about this and whether we were at the mercy of the developer. They were assured that design was one of our main issues and that we would be looking to insure good quality design of new developments.

### **Cults Community Council Consultation Event** **19 November 2009**

- Successful places are those where there is good access through development for walking, cycling. Many people use the proposed sites to gain access to areas further afield for walking and cycling, activities that are going on now have to be able to continue and this will happen with good accessibility. Access to small shopping facilities, corner shops etc is also important.
- Developments should be of a better quality, and should add to the appeal of Aberdeen rather than detract
- High quality development – house type that fits in with the area
- Policies to control quality and design of housing
- Long views of development need to be looked at. The new school at Cults looks fantastic close up yet the long view of the site from the river is not so pleasant

**Kingswells Primary School Consultation Event**  
**24 November 2009**

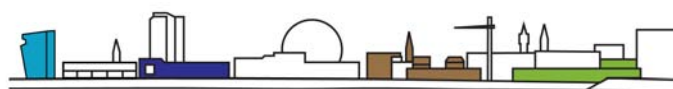
- The identity of Kingswells must be retained
- Quality of development is important

**Culter Primary School Consultation Event**  
**25 November 2009**

- Developers are only interested in making money. How can it be ensured that they take an interest in improving the quality of life of residents in the area?
- Development should be much more individual and less catalogue style. Sydney was mentioned as a good example of how individuals influence house styles to make them much more interesting.

**Mastrick Community Centre Consultation Event**  
**1 December 2009**

- The same type of layout and housing that is found in Sheddocksley would be acceptable in future developments.



## aberdeen local development plan

### Main Issues Report – Consultation Responses

#### Green Belt: Summary of Responses

21 respondents made comments on the issue of the Aberdeen green belt. These comments relate to the role of the whole Aberdeen green belt rather than any site specific issues, which have been addressed in the area responses. Below is a list of the comments and the responses to comments. Comments are only summaries, but the full content of each respondents' submission can be found on the City Council's website by going to the following link:- [http://www.aberdeencity.gov.uk/xlp\\_LocalDevPlanSearch.asp](http://www.aberdeencity.gov.uk/xlp_LocalDevPlanSearch.asp)

#### Green Belt Comments

- The green belt should be retained. It is a precious resource that cannot be replaced. The loss of green belt land will also have a negative impact on the environment.
- A green belt review is required by the Structure Plan to be completed by 2010.
- A green belt review needs to address the shape and form of the city to ensure that fingers of development are properly planned and provide continuous areas of and provide a sense of place for existing and new communities.
- The green belt Review and boundary changes should have been a main issue. There has been an inadequate justification of loss of green belt land.
- Object to the number of houses located on green belt sites in the first phase of the plan. There should be a preference towards brownfield development over development in the green belt. Potential to front load brownfield development and change the phasing.
- Development on the green belt will result in the loss of open spaces. In addition it is becoming widely accepted that lack of open spaces is linked to mental health disorders.
- The green belt makes Aberdeen a desirable place to live and should be retained.
- Suggested changes to green belt policy:
  - Development in the green belt should be allowed if it is within the curtilages of existing dwelling houses
  - Land proposed for development should be removed from the green belt
  - More development next to settlements should be permitted

#### Response to Green Belt Comments



## 1. Why there is a need to review the green belt and lose green belt land

The structure plan was approved in August 2009. It directs half of all new development for the region into Aberdeen City. The scale of growth anticipated by the structure plan means that more than half of this development will need to take place on greenfield sites. As the current green belt is tight to the existing urban area this means development on green belt land. This amounts to sites for up to 21,000 houses and 175 hectares of employment land. It says that this will mean reviewing the whole of the green belt to make sure that it meets the requirements of the structure plan and Scottish Planning Policy.

The purpose of the green belt is not to prevent development from happening its purpose is to:

- Direct planned growth to the most appropriate locations.
- Protect and enhance the quality, character, landscape setting and identity of towns and cities.
- Protect and give access to open space within and around towns and cities.

## 2. Green Belt Review

The Structure Plan requires a green belt review to be carried out jointly by Aberdeen City and Aberdeenshire Councils as part of their local development plan processes.

Developing the spatial strategy for the Local Development Plan has, in itself, provided the review of the green belt. The development option site assessment process, and the public engagement on the Main Issues Report have provided us with the required information to enable a review of the green belt boundary.

The development options process assessed all sites against physical constraints, environmental (including landscape) sensitivities, accessibility and infrastructure capacity. The detailed sustainability criteria can be found in the Development Options Assessment Report. The development options assessment includes consideration of Aberdeen's landscape setting and was informed by the Landscape Character Assessment and the Landscape Strategy for Aberdeen. We also considered whether sites have a role in providing land for recreation. In this way, when looking at a site's overall suitability for development (in terms of meeting its role of directing development to the most appropriate locations), the other two purposes of green belt (landscape setting and recreation) were considered at the same time.

Where we considered that a site's suitability for development outweighed its suitability in meeting green belt objectives, we would propose to remove it from the green belt and allocate it for development.

A more detailed explanation of the green belt review process will be published alongside the Local Development Plan, as background information.

### 3. Phasing of green belt allocation and promotion of brownfield development

Over the past 25 years development on brownfield land has made a significant contribution to housing in Aberdeen. Evidence from development during the mid 1990s suggests that high levels of brownfield development can co-exist with high levels of greenfield development. Whilst the Aberdeen Local Development Plan is only required to provide brownfield sites for 4,000 houses the policy approach would support a higher rate of development if the housing market can deliver the sites. Although the Structure Plan recognises the importance of new housing on brownfield sites, it also recognizes that greenfield housing is important. Therefore, the Structure Plan strikes an appropriate balance between them.

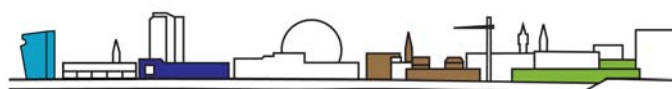
The balance of greenfield and brownfield development has been clearly set out in the Structure Plan. The Local Development Plan is required by legislation to be consistent with the Structure Plan, and there is a requirement for the Local Development Plan to deliver the approved development strategy that is set out in the Structure Plan.

### 4. Amendments to green belt policies

The green belt review that has been undertaken as a part of the Local Development Plan process identifies those areas of the green belt that are suitable for future development. Scottish Planning Policy requires existing settlements to be excluded from green belt designations. Settlements are places where people establish a community, and in our opinion all residential areas that currently provide services and facilities are already identified as residential areas.

A main objective of green belt is to direct planned growth to the most appropriate locations. The areas promoted for future development in the Proposed Plan will be rezoned to allow for future development. These allocations will allow for sufficient flexibility to deliver the housing requirements. Loosening the green belt boundaries across the whole of the city would not support the settlement strategy or our approach to delivering successful communities in the most sustainable locations.

Scottish Planning Policy on green belts does not make any allowance for residential development within the curtilage of existing properties. To allow this type of development would not meet the aims of the Structure Plan in creating sustainable mixed communities.



**aberdeen** local development plan

**Main Issues Report – Consultation Responses**

**Housing: Summary of Responses**

Question	Total no. of respondents	Respondents generally supporting Main Issues Report.	Respondents generally opposing Main Issues Report.	Respondents offering advice/ comment only.
Gypsy/ Travellers	42	19	10	13
Density	26	18	2	6
Mixed Use Areas and Alt.	40	30	5	5

For each housing issue a summary of the issues arising from comments have been listed, and these are split by supporting comments, objections and comments on how development could be more suitable. Supporting comments are comments which support the conclusions in the Main Issues Report. Comments, whether they be supporting a proposal, objecting to it or simply making a comment are, however, only summaries but the full content of each respondents' submission can be found on the City Council's website by going to the following link:-

[http://www.aberdeencity.gov.uk/xlp\\_LocalDevPlanSearch.asp](http://www.aberdeencity.gov.uk/xlp_LocalDevPlanSearch.asp)

**Gypsies and Travellers**

A large number of objections from both the general public and developers were received on the preferred option for allocating sites for Gypsies and Travellers on housing allocations over 1000 dwellings. There is, however, acceptance that this is an issue that needs to be dealt with through the Local Development Plan. Summary of comments on this issue are listed below:

*Supporting Comments*

- Clinterty should be reduced in size and a further facility provided.
- Need more land to be provided for Gypsies and Travellers.
- Agree that new developments should provide land.
- It will avoid unauthorised halting.
- Facilities at Clinterty are unacceptable.
- Should provide serviced sites/access to facilities.

*Objections*

- Why is there a need to provide for Gypsies and Travellers.
- Short term halting sites are not a good idea because the area is left in a mess with uncollected waste.
- Object to sites included in new developments.
- It may jeopardise housing developments.

- Inclusion in residential areas is unlikely to be welcomed by Gypsies and Travellers. Greenfield sites with reasonable access to schools, shops and other facilities are the only option.
- There should be a maximum timescale on transit sites.
- Requiring the provision of sites from housing developments would not meet the requirements of circular 12/1996.
- Prefer alternative option of dealing with applications on a case by case basis.
- There is an adequate supply shown by a recent assessment.

*Comments*

- Could ensure that sites are kept clean through conditions.
- Need a coherent policy on Gypsies and Travellers.
- There should be a maximum timescale on transit sites.
- The area south of the city would be an appropriate location for a Gypsy and Traveller site.
- Use Council owned land.
- You should consider whether suitable locations or specific sites for Gypsies and Travellers can be identified.

**Response to Gypsy Traveller Comments**

It is widely accepted that there is a national shortage of authorised sites for Gypsies and Travellers. This has led to an increasing incidence of unauthorised encampments and has sometimes created tensions between Gypsies and Travellers and the settled community. The supply of authorised sites, in appropriate locations, will help address the cycle of eviction that can be costly, and does not address the underlying need for a home.

While they have yet to be legally recognised as a separate racial group, the Scottish Government formulates policy around the idea that Gypsies and Travellers are a racial/ethnic group in their own right. The term 'Gypsies and Travellers' includes Scottish Travellers, Irish Travellers, Roma/Romany, English or Welsh Travellers and those who identify as Gypsy Travellers/Scottish Gypsy Travellers. It excludes Occupational Travellers (Travelling Show People/Show Travellers or Circus People) and New Age/New Travellers.

Scottish Planning Policy also recognises that Gypsies and Travellers have specific housing needs, often requiring sites for caravans and mobile homes. The needs of all Gypsies and Travellers for appropriate accommodation have been considered through the Housing Need and Demand Assessment. Given the typically transitory nature of Gypsies and Travellers, provision should be made for those communities which are in an area already and those who may arrive at a later date. Scottish Planning Policy requires authorities to identify suitable locations for meeting the needs of Gypsies and Travellers and set out policies about small privately owned sites.

Aberdeen City Council, Aberdeenshire Council and Moray Council jointly appointed Craigforth Research to undertake a Gypsies and Travellers accommodation needs assessment for Grampian. The research found that

pitch provision in Aberdeen was adequate, but recommended providing alternative permanent site provision in Aberdeen, halting sites for high pressure areas, to be provided between Aberdeen and Aberdeenshire, and allowance for the development of private sites.

In order to provide sites to meet the identified need for Gypsy and Traveller sites, specific areas will be identified to accommodate permanent and halting Gypsy and Traveller sites. The permanent and halting sites are to be for a limited number of pitches and will be of a scale that will not have a significant impact on the development that it is to be provided as a part of.

Permanent sites should be developed near to housing for the settled community. Gypsies and Travellers have the same requirement to access services and facilities, and it is a key role of the Local Development Plan to locate development in sustainable, accessible locations. Integrating sites for Gypsies and Travellers within new communities will help to promote social inclusion and reduce prejudices that the settled community have.

Contributions towards the provisions of Gypsy and Traveller sites would form a part of the affordable housing contribution and the level of contribution or land provided will form part of a legal agreement.

Currently unauthorised encampments do not provide services or waste collection facilities. The development of a site for halting will include water, electricity, gas, portable toilets and waste collection arrangements and will go some way to reducing tensions between the settled community and the Gypsies/Travellers. The development of halting sites would be for short term halting and will be managed to this effect.

### **Density Policy**

The majority of respondents agreed that there should be guidance on appropriate densities, but there was a mixed response to whether or not it is appropriate to set a density policy for all developments. Some respondents felt a policy could set out the elements that should be considered within the development, but not be overly prescriptive, and the detailed density would be dealt with on a site by site basis through masterplanning.

#### *Supporting Comments*

- Density policy would help to ensure a good mix of house types and sizes.
- Would reduce the amount of land take.

#### *Objections*

- A density policy is not appropriate.
- A density policy would be overly prescriptive, and not related to market demand.
- Problems arise when guidance becomes out-of-date.

#### *Comments*

- Support higher densities around public transport corridors and transport interchanges.

- Higher density developments should not be at the expense of open space.
- There is a need to deliver the correct type of housing.

### **Response to Density Comments**

In the interests of sustainability and efficient use of land, higher density developments are to be encouraged. The Structure Plan sets a target for all housing developments over 1 hectare in strategic growth areas to be in line with approved supplementary guidance and generally have no less than 30 dwellings per hectare.

A density policy will be included in the Proposed Local Development Plan. The policy would not be overly prescriptive, but would set the minimum standards and how this should be calculated. How comfortable a place feels is a matter of the design and it will be for the masterplan or planning application to determine which areas could accommodate higher or lower densities, providing an overall density of 30 dwellings per hectare is achieved. Higher densities also have the benefit of helping to maintain the vitality and viability of local services and facilities, provide the opportunity for effective provision of public transport, enhance the economic viability of development and increase energy efficiency.

In addition to using higher densities to promote a mix of house sizes, a policy requiring a mix of dwellings sizes will be included in the Proposed Local Development Plan.

### **Mixed Use Development**

The principle of mixed use development is supported in a number of comments. However, there is a feeling that industrial uses may not always be suitable, and care over the siting of such uses requires care. There is also a feeling that policy should be general about the mix of uses and it would be the role of the masterplan to detail the specific mix of uses for the site.

#### *Supporting Comments*

- Support developments that incorporate a mix of uses.
- Mixed use development creates more of a community.
- It will reduce people's dependence on cars and encourage social inclusion.

#### *Objections*

- Object to industrial areas being included in new housing developments.

#### *Comments*

- There is care required in the siting of heavier industries closer to residential areas.
- There is a need to have flexibility about the mix of uses on site.
- Supplementary Guidance should be adopted to guide the uses onsite, and this should be prepared alongside the Local Development Plan.
- Need to involve the community in deciding the appropriate mix for a site.

- Should provide community facilities and shops in the heart of the community.

### **Response to Mixed Use Comments**

Successful communities provide a wide range of services and facilities within walking distance, a widely used benchmark is 400m, which is a 5 minute walk. This improves the sustainability of an area encouraging walking and reducing congestion. Not all uses are appropriate in all areas of the site and each individual site will have different issues. It will be for the masterplan and subsequent planning application to ensure that neighbouring uses are complimentary and do not lead to conflict. The masterplanning process and new planning application process will ensure that the local community are involved in deciding the appropriate mix for the site.

The Local Development Plan will include a policy to support a mix of uses on larger sites to promote sustainable communities where there is the opportunity to live and work in close proximity. The employment element of the mixed use development will also assist in meeting the Structure Plan employment land requirements.

### **Affordable Housing**

Affordable housing was not identified as a 'Main Issue' in the Main Issues Report, but a number of comments relating to affordable housing were made. A summary of the comments received are listed below.

- A higher proportion of dwellings should be for smaller to medium sized 2/3 bed 'affordable' homes.
- Need to provide social housing in new developments.
- Housing must be realistically priced to retain people in Aberdeen.
- Affordable housing in more affluent areas does not work.
- Market housing and affordable housing should be separated.
- Better definition of affordable housing is required in the Local Development Plan.
- Developers want a clear indication of the affordable housing requirement.
- Should improve existing affordable housing areas rather than include in new developments.
- Concerned about the value of deferred payments and subsidised sales.
- Would like to see at least 25% affordable housing contribution from all new developments.
- Regenerate existing areas of social housing.
- We would expect the Proposed Plan to set out the headline proportion of affordable housing required and would support the use of supplementary guidance to describe detailed delivery mechanisms for affordable housing.
- The balance of provision between affordable housing, rented and intermediate tenures has a significant impact on development economics. It would be helpful in the Proposed Plan or its supporting documents, to include a reference to the overall proportion of need for

affordable housing which can be met by intermediate tenures, for example, shared equity and mid market renting.

### **Response to Affordable Housing**

There are severe affordability pressures in Aberdeen and the Aberdeen Housing Market Area and there are chronic levels of housing need<sup>1</sup>, as identified by the Housing Need and Demand Assessment. The Council and RSLs will not be able to meet the need for affordable housing and given the affordability pressures of housing in Aberdeen, market housing will be unable to meet the needs of those that cannot currently afford market housing. Therefore, through the use of planning policy there is a need to deliver housing below market value. The policy in the Local Development Plan will require that all residential developments greater than 5 units provide a 25% affordable housing contribution. Alongside the policy Supplementary Guidance will be produced that will provide more detail on the type of affordable housing, how the requirements are delivered, and more detailed information about the legal agreements that the Council will expect to enter into with developers.

There are a range of affordable housing options available, including: social rented, shared ownership, shared equity, discounted low cost sale, housing without subsidy and mid-market rented accommodation. Each of these has a role to play in meeting housing need. The preference of the Council in the majority of cases will be to deliver social rented accommodation. However, this relies on public subsidy and is not always deliverable. Where public subsidy is not available, or will only meet part of the requirement, affordable homes built without public subsidy will have a role to play.

The Housing Need and Demand Assessment provides an analysis of those people in housing need that could afford intermediate housing. Generally, the analysis indicates that there is considerable potential for intermediate housing, under current housing market conditions. The potential ability to afford intermediate housing is not the same as demand for such products, and this proportion is based on current assumptions about the future housing market. Guidance contained within Supplementary Guidance will be included to outline the potential contribution of intermediate housing, but no requirements will be included in policy.

The priority of policy will always be to deliver affordable housing on-site, in all areas of the city, and it will only be in exceptional circumstances that an off-site contribution or commuted payments would be accepted. Delivering integrated affordable housing on-site improves the deliverability, encourages mixed communities and helps to promote social inclusion.

The Local Development Plan will continue to support the Aberdeen Community Regeneration Masterplans through allocations and policy. However, there is a need to promote inclusion within new developments. Also

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<sup>1</sup> Refers to households lacking their own housing or living in housing that is inadequate or unsuitable, who are likely to be able to meet their needs in the housing market without some assistance.



the delivery of new affordable housing is heavily reliant on the land and contributions provided as a part of new developments.

### **Other Comments**

Other general comments on the topic of housing were received. A list of the general comments with responses is listed below:

**Comment:** Need to provide housing that will meet the needs of a future influx in population.

**Response:** The housing allowances that have been set by the Structure Plan are significantly higher than the previous Structure Plan. This is partly to meet the needs of a growing population, caused by in-migration. Through policy, we would aim to deliver a range of house types and sizes to meet all housing need and demand.

**Comment:** Housing releases will be required in advance of the Local Development Plan being adopted in 2012.

**Response:** It is extremely unlikely that the Local Development Plan will be adopted before 2012. From our assessment of land supply, we are aware that in the short term land supply will be below 5 years. This is what has prompted the preparation of a new local development plan so soon after adopting the current local plan.

**Comment:** Need to accommodate for an aging population, more schemes similar to Tor-na-dee.

**Response:** There has only been one proposal for an extension of a care home and we have supported this. New care homes, or residential developments would be accommodated on or within new and existing residential areas.

**Comment:** Key worker accommodation, for example hospital workers, is a matter that requires further consideration.

**Response:** The Structure Plan provides a generous supply of land to meet future housing requirements. By significantly increasing the supply of a range of house types and sizes in Aberdeen this may improve labour mobility in the area. No specific allowance is to be made for key worker accommodation.

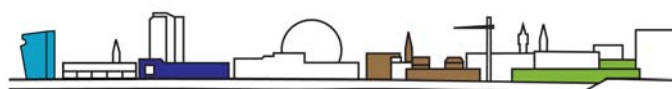
**Comment:** The Proposed Plan, or its supporting documents, should address the mix of house types and sizes required to meet the full range of housing need and demand, as identified by the Housing Need and Demand Assessment. It is important that the preparation of the Proposed Plan is fully informed by the findings of the Housing Need and demand Assessment.

**Response:** The Housing Need and Demand has inputted directly into the work on the housing policies. A consensus has been reached with the Strategic Housing Market Partnership on the conclusions from the Assessment and we expect to have received feedback from the Centre for

Housing Market Analysis before the Proposed Local Development Plan is reported to Council in August.

**Comment:** The Proposed Plan or its supporting documents should provide the detail and timescale for implementation of the policy proposals on housing for an ageing population, housing for multiple occupation and Gypsies and Travellers.

**Response:** Housing need for the elderly or people who require houses in multiple occupation will be met through the general housing provision. Specific sites and policies to provide land for Gypsies and Travellers have been made and the action programme will set out the timescale for delivery of these policies.



**aberdeen** local development plan

**Main Issues Report – Consultation Responses**

**Infrastructure & Developer Contributions: Summary of Responses**

<b>Main Issues Report Comment/Question</b>	<b>Number of Comments</b>	<b>Support</b>	<b>Object</b>	<b>Comment</b>
Agree with the concept of Supplementary guidance	65	37	0	28
Major Infrastructure	5	0	0	5
Delivery of Infrastructure	14	0	0	14
Infrastructure Requirements	11	0	2	9
Cross-boundary Issues	4	0	0	4
Specific Area Issues	17	0	0	17
Other	11	0	0	11
Policy/Suggested Policies	7	0	0	7
<b>Total</b>	<b>134</b>	<b>37</b>	<b>2</b>	<b>95</b>

Each policy question relating to infrastructure and developer contributions has been split into sub-issues. A summary of the issues arising from comments has been listed, and these are split by supporting comments, objections and comments. Supporting comments are comments which support the conclusions in the Main Issues Report.

**Source of Responses**

A total of 134 different comments were received relating to infrastructure and developer contributions. These responses came from:-

- 52 Individuals;
- Bridge of Don Community Council;
- Cove and Altens Community Council;
- Culter Community Council;
- Cults, Milltimber and Bielside Community Council;
- Kingswells Community Council;
- Mastrick and Sheddocksley Community Council;
- Torry Community Council;
- Civic Forum;

- The Scottish Environment Protection Agency;
- Scottish Natural Heritage;
- The Scottish Government;
- Homes For Scotland;
- Langstane Housing Association;
- Grampian Housing Association;
- NESTRANS;
- SportScotland;
- Scottish Water; and
- 7 submitted on behalf of development industry/land owners.

## 1. Summary Overview of Responses

### i. Do you agree with the concept of supplementary guidance for developer contributions?

#### *Supporting Comments*

37 supporting comments were received in total. 23 members of the public, 7 Community Councils, Scotia Homes Ltd, SEPA, Stewart Milne Homes, Ryden LLP, Langstane and Grampian Housing Associations, Scottish and Southern Energy, Jones Lang LaSalle, Knight Frank LLP, NESTRANS, Homes for Scotland and the Scottish Government all made comments that were supportive of the Main Issues Report approach.

#### *Objections*

No objections were received to the principle of supplementary guidance for developer contributions.

#### *Comments*

28 general comments were received regarding the proposed supplementary guidance for developer contributions; these were from members of the public, Bancon Developments Ltd, Knight Frank, the Civic Forum, Paull and Williamsons LLP, and Langstane and Grampian Housing Associations.

- Whether or not the supplementary planning guidance will go through public consultation before it forms any part of the Development Plan.
- The Housing Associations wish to contribute to the supplementary guidance, whilst others believe it should be prepared in full consultation with key stakeholders such as service providers, landowners/developers and the public.
- Concern that developers will simply cherry pick from one site to the next to minimise the infrastructure impact in any one place and the developer contribution required of them.
- Concern over whether there is merit in the Local Authority front-loading major pieces of infrastructure and subsequently reclaiming cost from developers. Homes for Scotland consider that contributions currently fall unequally on the house-building sector. Two other respondents queried the Council's ability to finance its own share of infrastructure

improvements, one in particular indicating that time limits in particular could also pose a risk to infrastructure provision.

- Another respondent suggests that where more than one landowner/developer exists, the Council adopts the role of a 'broker' between these different parties to ensure development is delivered.
- Early identification of developer contributions is needed to give certainty and clarity to developers.
- Policy is not strong enough and does not actually measure the effect of additional development on infrastructure.
- The current approach being taken to developer contributions by the city council is not supported.
- Some respondents stressed the need to comply with Circular 12/1996, particularly in terms of the need for contributions to be commensurate in scale and kind to development proposed.
- Concern that due to the economic downturn there may be constraints on funding major development proposals and the up-front funding of infrastructure provision.
- Flexibility required – policies and SG should allow for any change in circumstances and should not attribute sums or figures to specific projects, as costs for infrastructure provision may change over time.

### ***Response***

We note the widespread support for the principle of preparing Supplementary Guidance on Infrastructure & Developer Contributions. Further details on the proposed Supplementary Guidance will be set out in the Proposed Plan, which is expected to be published in September 2010. The public consultation will provide an opportunity to make comments on the proposed policy framework, including the Supplementary Guidance.

Since publication of the Main Issues Report, Scottish Government has published Circular 1/2010 on Planning Agreements, which replaces Circular 12/1996. The new Circular enables Local Planning Authorities to address the cumulative impact of development, however, it also emphasises that infrastructure or financial contributions should only be sought where they are required to mitigate the impact of development.

The Council proposes a policy framework which will show how the provision of infrastructure or costs for mitigating the cumulative impact of development will be met, within or apportioned to, the development sites proposed. In doing so, developers will be liable for making a fair and appropriate contribution, commensurate in scale and kind with the development proposed. Significant infrastructure requirements will be made clear from an early stage in the preparation of the Local Development Plan to provide clarity and certainty to the Council, its partners, and the development industry. The policy framework will need to ensure that there is sufficient flexibility in the plan should circumstances change. Any infrastructure costs associated with specific items of infrastructure, or those attributed to specific sites/areas, will

be subject to review through future Local Development Plans or Supplementary Guidance.

The City Council has worked in close partnership with a wide range of agencies – through the Future Infrastructure Requirements for Services Group (or FIRS) – to establish the infrastructure requirements. These key agencies have provided the Council with their views on infrastructure requirements, based on their own specialist and technical knowledge. Transport modelling has been undertaken to assess the strategic transport infrastructure which is likely to be required to support new development. This work has taken account of the cumulative impact of growth across the whole region, not just within the City.

Where there are neighbouring/adjacent sites with more than one landowner/developer interest, the emerging policies seek for these parties to work together in order to prepare a joint masterplan to ensure the overall site(s) are delivered.

## ii. **Major Infrastructure**

### *Objections*

5 comments were received. 2 were from members of the public, 2 from Transport Scotland and 1 was from an agent on behalf of a developer.

- Object to level of new development before major pieces of infrastructure such as the Western Peripheral Route (WPR), the Third Don Crossing and improvements to the Haudagain roundabout are built.
- Concern over the ability of the existing strategic road network particularly in the A90 and A96 corridors and prior to delivery of the AWPR, to accommodate significant additional growth.
- Transport Scotland highlight that should any improvements to the AWPR be required as a result of development proposals, they will require to be developer funded and undertaken following the completion of the committed scheme in 2012.
- Crossrail - Under Section 2 entitled “Vision and Objectives”, it is mentioned that delivery of the Aberdeen Crossrail project is currently being investigated by Nestrans, involving the provision of new stations and improved rail services between Stonehaven and Inverurie. This intervention was not considered for inclusion within the Strategic Transport Projects Review (STPR), as it was considered to provide only local and regional benefits. However, a combination of Intervention 19 (Rail Service Enhancements between Aberdeen and Inverness) and 23 (Rail Service Enhancements between Aberdeen and the Central Belt) would provide significant national level benefits in terms of improving better connections between the cities. Consequently, this intervention does not form part of Transport Scotland’s future investment programme. This should be clearly stated within the Proposed Plan, which should distinguish between infrastructure that will be required for the delivery of the plan proposals and infrastructure that is aspirational in nature and will not be delivered within the plan period.

### **Response**

As previously discussed, an initial transport modelling exercise has been undertaken and further detailed modelling is being carried out to help identify the strategic transport improvements that will be required in order for development to be successfully accommodated in these areas.

It will be expected that any improvements or access points to the AWPR as a result of development proposals will be developer funded.

### **iii. Delivery of Infrastructure – Process/Viability/Funding**

#### *Comments*

14 comments were received. 9 were from members of the public, 2 from the Civic Forum, 1 from Transport Scotland, 1 from ACSEF and 1 from an agent on behalf of a developer.

- How does the council intend on ensuring that developers fulfill their obligations and those services, facilities and infrastructure provided are both wanted and needed locally?
- Transport Scotland has concern over the deliverability of this amount of housing.
- The idea of up front infrastructure being provided by the Local Authority and reclaimed from developers should be explored.
- All infrastructure should be in place before new development takes place.
- The collective impact of additional houses must be looked at, not on just a site specific basis.
- No details have been provided of specific needs or how and when the infrastructure will be delivered.
- A review and improvement of the current infrastructure must be carried out before new plans are embarked upon to grow the region, otherwise the same problems will still exist at a bigger scale.
- Constrained public sector finance will require significantly more investment from the private sector particularly for the delivery of the large infrastructure projects outlined in the Economic Development Plan. Therefore improved infrastructure provision achieved through developer contributions should act as a catalyst for further private sector investment in flagship economic development projects.

### **Response**

The amount of housing proposed in the Local Development Plan is based on targets set out in the Aberdeen City & Shire Structure Plan, which was approved by Scottish Government in August 2009.

The FIRS process has taken account of the cumulative impact of growth across the whole region, not just within the City. Where there are neighbouring/adjacent sites with more than one landowner/developer interest,

the re may be merit in parties working together in order to prepare a joint masterplan to ensure effective delivery of the overall site(s).

Based on feedback from the FIRS process, the Local Development Plan will set out the infrastructure requirements to support new development in different areas of the City and prepare an Action Plan. New development and accompanying infrastructure should be provided in accordance with the phasing proposed and the details set out in the action plan and Local Development Plan. There will need to be an element of flexibility built into the policy framework in case the rates of housing delivery do not come forward as planned.

#### iv. **Infrastructure Requirements**

##### *Comments*

11 comments were received. 6 were from members of the public, 1 from Ryden LLP, 1 from Sportscotland, 1 from Kingswells Community Council, 1 from Scottish and Southern Energy and 1 from Bridge of Don Community Council

- There is a need to ensure that there is adequate provision made for health care facilities to serve new development. They should be centrally located to the community, making them visible, accessible and where public transport exists.
- The significant scale of development will place additional demand on existing sports facilities and create a need for new ones. The Sports Pitch Strategy should be updated and Sportscotland could assist in funding for this. Through this modelling could be carried out which would determine where best to locate new facilities. The best locations are likely to be beside schools which could integrate school and community use of facilities.
- Developers must take consideration of the long-scale management of developments and contribute to the associated costs often picked up by the council/neighbourhoods.
- Welcome the idea that major new development requires a network of new infrastructure to meet the Plan's vision.
- Currently a concern with foul drainage infrastructure capacity and Aberdeen's bathing waters.
- It will be important to carefully plan any new electricity, gas or telecom infrastructure required to serve new developments.
- Planning authority needs to incorporate access rights in development plans and to protect paths and green networks from development. Paths are an important sport and recreation resource that should be fully taken into account as part of assessing growth options for housing and economic development sites.
- In assessing growth options a proper audit of paths should be undertaken which takes into account their popularity and what activities they are used for. Cross reference should be made to Aberdeen's core paths plan and access strategy (if you have one).

##### *Objections*



2 objections were received. 2 were from members of the public.

- Planned development will overload the capacity of primary and secondary schools.
- Inadequate schools and doctors surgeries for the scale of development.

### ***Response***

The City Council has worked in close partnership with a wide range of agencies – through the Future Infrastructure Requirements for Services Group (or FIRS) – to establish the infrastructure requirements. These key agencies have provided the Council with their views on infrastructure requirements, based on their own specialist and technical knowledge. Transport modelling has been undertaken to assess the strategic transport infrastructure which is likely to be required to support new development.

Developers of new sites will be liable to provide or contribute towards the infrastructure required to mitigate the impact of that development. The requirements for infrastructure and services will be identified in the Local Development Plan, Supplementary Guidance and the Action Plan, and will include schools, health facilities, sports, cultural and community facilities, open space requirements, public transport services or infrastructure, roads and affordable housing.

Where possible the Council will seek to make best and most cost-effective use of the infrastructure provision by co-locating services or creating dual-use facilities. For example, where new schools are proposed we intend to create a community campus which incorporates dual-use facilities for the school and community use and to co-locate other key services adjacent to the school. This could include sports facilities, libraries, GP and dentist facilities and possibly police within or alongside the school building.

Council is working with Scottish Water in relation to the implications of new development for water provision and waste water treatment and the mechanisms required to deliver such improvements. Connection to the public sewer will be a pre-requisite for new developments, and if it has been identified that there is insufficient capacity, developers will be required to contribute to upgrading of the water or waste water network.

The criteria used to assess the suitability of Development Options sites to accommodate development included the relationship of a site to Core Paths. The emerging policies in the Local Development Plan seek to protect any paths identified in the Core Paths Plan and should be protected and enhanced through new development.

The site assessment criteria also considered the ability of existing schools to accommodate the pupils likely to be generated by a new development, or to identify where new schools would be required. Where new development creates the need for new or extended school provision, developers will be

expected to cover the cost of accommodating the need created by the development.

## v. Specific Area Issues

### *Comments*

17 comments were received. 15 were from members of the public, 1 was from NHS Grampian and 1 was received from Mastrick and Sheddocksley Community Council.

- There is a need for more facilities and services for new and current residents of Bridge of Don.
- Lack of sport facilities in Deeside
- Residents in Milltimber do not support a local shop in Milltimber.
- Torry Community Council would be opposed to any change in secondary school educational provision which covers Area H and Torry.
- Services in Lower Deeside will not be able to deal with the influx of people to the area.
- Kirk Brae is already a dangerous road and therefore further development would worsen this and other roads within the area.
- Bridge of Don is in need of a new bridge and cycle/footpath connections where current traffic levels and grid lock is unacceptable.
- The Langstracht is in need of improvement to alleviate the high levels of congestion at peak times. Any more development would make this worse.
- North Deeside Road and Garthdee Road have traffic problems and this will be compounded by more development.
- There is need for a link road between North Deeside Road and Garthdee which would avoid the Mannofield crossroads.
- Development should be located at as close as possible to major trunk routes and specifically beside Milltimber Brae bypass junction on Deeside.
- Development should take the form of what had been built at Portlethen where major infrastructure has been planned prior to building work taking place.
- The roads infrastructure to the west of the city is inadequate, particularly in Cults and Pitfodells, to cope with the increased traffic flows the plan will generate.
- Electricity, gas and telecoms infrastructure may need to be protected with relation to development proposed near the AWPR. Alterations or diversifications required will need to be funded by the developer.
- New facilities are needed in the city centre and regeneration areas. A site has been identified in the Woodside area to serve both Woodside and Tillydrone communities. Also, a new facility is required close to the city centre to accommodate the two practices requiring to relocate from their sub-standard accommodation in the existing Denburn Centre. This requires being within half a mile radius of their existing location. NHS Grampian would welcome a dialogue with the City Council on identifying a potential site within that area.
- There are not enough community facilities in Cove. The number of houses will require quite a lot more facilities.

### **Response**

The City Council has worked in close partnership with a wide range of agencies – through the Future Infrastructure Requirements for Services Group (or FIRS) – to establish the infrastructure requirements. These key agencies have provided the Council with their views on infrastructure requirements, based on their own specialist and technical knowledge. Transport modelling has been undertaken to assess the strategic transport infrastructure which is likely to be required to support new development.

Developers of new sites will be liable to provide or contribute towards the infrastructure required to mitigate the impact of that development. In other words, where a new development creates the need for new or expanded services, the development will be liable for meeting the cost of that infrastructure. The requirements for infrastructure and services will be clearly identified in the Local Development Plan, Supplementary Guidance and the Action Plan, and will include schools, health facilities, sports, cultural and community facilities, open space requirements, public transport services or infrastructure, roads and affordable housing.

Where possible the Council will seek to make best and most cost-effective use of the infrastructure provision by co-locating services or creating dual-use facilities. For example, where new schools are proposed we intend to create a community campus which incorporates dual-use facilities for the school and community use and to co-locate other key services adjacent to the school. This could include sports facilities, libraries, GP and dentist facilities and possibly police within or alongside the school building.

There is no evidence to suggest that a link road between Deeside and Garthdee is required at present. This will depend on the outcome of the transport modelling, the results of which are expected in June 2010.

## **vi. Cross-boundary Issues**

### *Comments*

4 comments were received. 2 were from Kingswells Community Council, 1 was from PPCA on behalf of Banchory Leggart and the other comment was from Stewart Milne Homes.

- Concerns that cross-boundary issues relating to educational capacity have not been taken into account. I.e. a new Secondary School proposed at Banchory Leggart would free up capacity at Cults Academy, as pupils living south of the Dee can attend Banchory Leggart School – and hence allowing for more development within the North Deeside Corridor.
- Both authorities, Aberdeenshire and the City, must co-ordinate their requests for developer contributions given this site lies partly within both authorities.

- There should be some provision for developments in Aberdeenshire to contribute towards the cumulative effect they will have on the road network in the city.

### ***Response***

Aberdeen City Council has worked closely with Aberdeenshire Council and the Planning Gain Team regarding cross-boundary issues during the development of the Local Development Plan. This has included coordinating the two authorities' emerging policy framework in relation to infrastructure and developer contributions. As part of this work, we have assessed the level of contributions required for sites which have a cross-boundary impact on infrastructure and services.

### **vii. Other**

11 comments were received. 6 were from members of the public, 1 each was received from Kingswells and Mastrick/Sheddocksley Community Councils, 1 from Paull and Williamsons LLP and 2 were received from Scottish and Southern Energy PLC

- Based on past experience there is no confidence that the Planning Gain Team will ensure developers pay contributions and therefore it is felt that a major improvement to the system is required
- Welcome the establishment of the Future Infrastructure Requirements Group which will assess the infrastructure needs prior to the approval of development.
- Guidance is not strong enough. New development should be hard linked to the prior development of adequate transport and other infrastructure. Guidance only allows for the watering down or delay of key infrastructure projects leading to planning failure and blight.
- Roads infrastructure costs should be borne by the developers and not the local taxpayers.
- New roads will be needed on Deeside due to the congestion that will occur with the vast expansion that is planned.
- Renewable energy developments could also be considered through this planning process and could be delivered through an Energy Services Company (ESCo). An ESCo can deliver good financial returns, therefore not only delivering renewable energy development but also likely to incentivise appropriate development partners. Recommend that ESCOs within the larger growth areas be reflected within the Local Development Plan and taken forward as a matter of early engagement with the respective developers.
- Local Development Plan should recognise the statutory requirements under SHETL to provide connections to energy generation projects and distribution, and SHEPD to provide connections to generation projects and developments with demand, such as settlement expansion, in the most efficient, coordinated and economical manner. Also SGN requires

to provide connections upon request to all premises and to pipelines operated by an authorized transporter in the most economical and efficient manner.

### **Response**

Supplementary Guidance on infrastructure and developer contributions is being developed alongside the Local Development Plan which will provide clear guidance to developers, landowners and agents, identifying the infrastructure required for their site to be successfully developed and any negative impacts mitigated against. The system should provide a robust framework for applying requirements for infrastructure and services, and will enable their timely provision.

### **viii. Policies/Suggested Policies**

7 comments were received. 3 were from SEPA and 4 were received from Scottish and Southern Energy PLC

- Current Local Plan contains a SUDS policy – it is expected that this will be taken forward into the new Plan and through the masterplanning process. In order for SUDS and buffer strip policies to work effectively, SEPA request that existing and future allocations be reviewed in terms of capacity to provide adequate space for such infrastructure before final allocations appear in the Plan. We would very much welcome the opportunity to work with Aberdeen City Council to produce guidance, similar to Aberdeenshire, which would help to protect and enhance the water environment with the City
- Current Local Plan contains a foul drainage policy – it is expected that this will be taken forward into the new Plan and the preferred sites identified in the Main Issues Report will comply with this policy.
- Local Development Plan should include appropriate policies to guide the planning for electricity transmission and distribution and gas networks, as well as to guide ACC's consideration of such developments. SHEPD and SHETL are required to consider the placement, retention, upgrading and refurbishment of overhead electricity lines within Aberdeen where these must avoid major areas of the highest amenity value and protect other environmental interests. Therefore a balance must be drawn between technical, economic and environmental considerations.
- Local Development Plan policy framework should positively promote provision of telecoms infrastructure.
- Local Development Plan policy framework should include a supportive policy framework for gas network upgrades
- Policies should make appropriate provision for sites associated with the sub-sea transmission network mentioned in NPF2. For example

onshore terminals or new/modified circuit arrangements to tie nodes into existing networks.

## **2. Summary of Consultation Event Comments**

### **Airyhall Primary School Consultation Event** **2<sup>nd</sup> November 2009**

- Concern that the development proposed is dependent on delivery of the AWPR and that roads are already at capacity and can not take additional traffic.

### **Cove/Kincorth/Nigg event** **18 November 2009**

- The roads around the areas cannot cope with the level of development proposed.

### **Culter event** **25 November 2009**

- Satellite towns are a good idea, as long as they have the infrastructure necessary to make them sustainable.

### **Stoneywood Primary School Consultation Event** **16th November 2009**

- Satellite towns are a good idea, as long as they have the infrastructure necessary to make them sustainable.
- A bridge over the Don connecting Whitestripes to Dyce was a good idea
- The WPR should be built first.

### **Mastrick Community Centre Consultation** **1<sup>st</sup> December 2009**

- no adequate infrastructure – got to put this in before housing
- AWPR – good – when will this happen?
- forward funding good to get infrastructure first then housing
- Concerns with regard to the housing numbers and what impact this would have on the already busy roads.

### **Scotstown Primary School Consultation** **23rd November 2009**

- Not convinced that the WPR will happen.

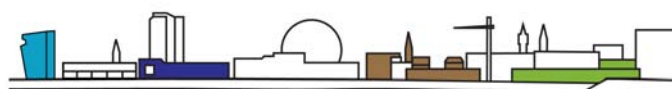
- New facilities should be delivered alongside new developments. Where land is reserved for new facilities, it should not be developed for anything else.
- Third Don Crossing may be needed but roads beyond it into the city centre require improvement.
- Persley Bridge should be dueled with over passes over the Haudagain.
- The Aberdeen Western Peripheral Route has to come first.
- A flyover should be considered from the Parkway and over the Haudagain roundabout.
- We don't believe additional infrastructure will be delivered, having waited for so long.
- We would accept more development if the infrastructure was in place.

**Milltimber Primary School Consultation**  
**11<sup>th</sup> November 2009**

- Concern that the development proposed is dependent on delivery of the AWPR and that roads are already at capacity and can not take additional traffic.
- Need more details on how developments will work in practice, especially in road traffic terms. Deliverability is key – we need to be very clear about what infrastructure is required (not just roads, but water and sewage, schooling as well) and how it will be delivered. Concern that infrastructure to support development won't be provided. The Plan also needs to be coherent on issues such as affordable housing.
- Some support was given to development further away from existing communities that could pay for and provide its own infrastructure, without impacting on existing areas.

**Aberdeen Youth Council Consultation**  
**27<sup>th</sup> October 2009**

- Question about whether infrastructure would be put in place before housing is built and how infrastructure would be funded.



## aberdeen local development plan

### Main Issues Report – Consultation Responses

#### Miscellaneous: Summary of Responses

35 Comments were made that do not relate to a specific site, proposal or issue in the Main Issues Report. Below is a summary of these comments and the responses to comments follow each comment. Comments are only summaries, but the full content of each respondents' submission can be found on the City Council's website by going to the following link:-

[http://www.aberdeencity.gov.uk/xlp\\_LocalDevPlanSearch.asp](http://www.aberdeencity.gov.uk/xlp_LocalDevPlanSearch.asp)

#### Comments and Responses

**Comment:** Concerned at how developers continue to provide false information in their submissions, such as about problems with drainage, flooding and waterlogging. Several pieces of information submitted by developers are patently misleading and simply wrong.

**Response:** The information provided by developers in support of their proposals has been useful, but in all cases an independent assessment of the site, including checking any details submitted, was undertaken by planning officers.

**Comment:** Development around the AWPR should not be allowed. Consideration to re-routing the AWPR should be given. There is no economic justification for the AWPR.

**Response:** The route for the AWPR has now been approved and work is ongoing to deliver the AWPR. The strategy for development promotes development in the most sustainable locations and does not promote development around the AWPR.

**Comment:** Believes the whole exercise is a waste of money and futile. Object to the process of a Main Issues Report, It is also obvious, although not admitted by Aberdeen City Council, that all proposals included in the ALDP when approved will go ahead without the chance for official objections from the public to be fully considered. The public are making comment and opinion of development proposals at a stage where they are not fully described. This is not a suitable way of involving the Community in the process.

**Response:** The Scottish Government promote the operation of an efficient development planning system, and require local authorities to provide an up-to-date and practical framework within which the outcome of planning applications can be decided with a degree of certainty and efficiency. The Main Issues Report forms part of the development planning process. It is the first stage in engaging with the public on future growth opportunities and the main issues that will affect new development. It is not possible to be able to



provide complete detailed information for the development options. However, through the production of masterplans, developers will be required to work with the local community on the issues that will shape the new development.

**Comment:** Notes that there are errors with the arithmetic on the scoring methodologies. Hopes this is not on purpose to make sure some developments 'fit the bill'.

**Response:** The sustainability checklist was one of three assessments we used to help us come to a decision on which sites are most suitable for development. The other information used to guide decisions were the Transport Framework and Strategic Environmental Assessment. Assessments of this breadth are, by their nature, subjective, and the assessments on their own do not tell us whether a site is suitable for development or not. However, they provide a wealth of information, which, when taken together, helped us to reach a view on the suitability of each site. The individual score did not directly influence the decisions on the preferred sites.

**Comment:** The Local Development Plan must include the identification of the site (King Street/Beach Esplanade - OP47) which has already been identified by Aberdeen City Council for a Mosque, community facilities and open space in the adopted Local Plan 2008.

**Response:** This site is included in the adopted Local Plan and will be carried forward into the Proposed Local Development Plan.

**Comment:** The local plan may not be approved until 2012 - does this mean that all the timetables, which start in 2007, will be moved out by 5 years? Will a new structure plan be bound by any of the policies adopted? Or will it give the chance to monitor progress and if necessary review?

The timeframe of the proposed Aberdeen Local Development Plan is not well understood, with the extended period of 2012 to 2023 likely to outlast the active interest of those currently commenting. There should be robust arrangements for keeping the plan under active review. The plan should implicitly contain arrangements to review and improve the content and policies contained in it, so that there is adequate flexibility to take full advantage of opportunities. We are aware that there may be legal constraints on this.

**Response:** The development plan process involves constantly reviewing plans to ensure that they are relevant and up-to-date. A review of the current Structure Plan to produce a Strategic Development Plan will be started this year. This review will re-visit all of the principles behind the strategy and the aims and objectives in the current Structure Plan. The Local Plan will also be kept under 5 yearly review to ensure that it is up-to-date and meets the requirements of the approved Strategic Development Plan.

The housing targets will not be moved on by 5 years. The Local Development Plan is required to allocate land on a range of sites to meet the housing land requirement up to year 10 from the predicted date of adoption. In addition to the 10 years post adoption the Local Development Plan will be required to deliver the housing requirements from 2007 to the predicted date of adoption. Therefore, the Local Development Plan will deliver the first two phases of the Structure Plan Housing Allowances, 2007-2023.

**Comment:** Detailed matters are better publicised through Pre-Application Consultation and subsequent neighbour notification as part of a formal planning application submission.

**Response:** We would agree that a large amount of the detailed masterplanning will be the key stage in identifying the detailed development and engaging the community on what the development should include.

**Comment:** Support the various representations made by Bancon Development in respect of the strategy followed in the Local Development Plan and the Main Issues Report.

**Response:** Noted.

**Comment:** Aberdeen City Council currently has a vacancy for Head of Planning and Sustainable Development. How can the council hope to handle their proposed developments in a professional manner when the key player in the team is not there?

**Response:** Aberdeen City Council has been through a process of restructuring, and this process has now been completed. At all times during the process there has been a Head of Planning and Sustainable Development in post.

**Comment:** Amendments to Policy 68: policy should recognise the current business and industrial land supply and appropriate amendments should be made to encourage alternative uses for the site.

We ask the Council to include hotels as an acceptable ancillary use for business and industrial land in an updated Policy 68.

**Response:** It has been recognised that the economic development policies within the current Aberdeen Local Plan 2008 are in need of review and in particular it is agreed that Policy 68 should be amended to include hotels as an acceptable ancillary use for business and industrial land.

**Comment:** The plan lacks a section on business use. We would like to see the addition of a main issues section in part 4 on the provision of land for enterprise and jobs, and be able to comment on this section.

**Response:** The purpose of a Main Issues Report is to identify changes that have occurred since the previous plan and set out the authorities big ideas for future development. The Main Issues Report included a section to set out employment land allocations for the Local Development Plan. In addition to the employment land allocations there will be policies contained in the Local Development Plan to promote economic development in the area.

**Comment:** The City should be far more ambitious about the future. The role of the City of Aberdeen is key to a prosperous future for the region. Too much time is spent on the process of managing detailed implementation and far too little on the shared vision for the future. This vision should aim high and provide clarity for future policy, and decision-making. The region needs leadership of the Aberdeen City Council to achieve this.

**Response:** Agreed. The Structure Plan and ACSEF Economic Manifesto set ambitious growth targets for the region. The role of the Local Development

Plan is to translate these visions and objectives into land use allocations and planning policy that sets a framework within which the outcome of planning applications can be decided with a degree of certainty and efficiency.

**Comment:** Wherever possible, development planning should demand best practice in both environmental and economic sustainability. This can be achieved by systematically making progress against a grand plan, which has efficiency built in. We note that the draft plan gives ample space to these issues.

**Response:** Sustainability is the core ethos of planning, and the planning system. All proposals in the Main Issues Report have been produced with the objective of contributing to sustainable development. Support is welcomed.

**Comment:** We are not currently taking full advantage of the opportunities for improvements provided by the process change delivered by the 2006 Planning etc. Act. The chamber is engaged closely with both local authorities in order to deliver these improvements. This is a difficult journey, and the Development Plan should be designed to facilitate this changed approach rather than hinder it. The plan should be future-proofed.

**Response:** We would agree that there is a lot of work to fully deliver the improvements delivered by the 2006 Planning etc. Act. However, we are working towards the delivery of a Local Development Plan that meets the requirements of the Act and supports culture change in the planning process by being: efficient, inclusive, fit for purpose and sustainable. The plan includes a plentiful supply of land for housing and business to meet arising need and the plan will be reviewed every 5 years to ensure that we have an up-to-date Local Development Plan.

**Comment:** We remain convinced that there is more scope to integrate the plans of the City and Shire, to share costs and skills, to mitigate risk, and to take full advantage of opportunity, and to provide a better integrated future for the citizens and enterprises in the region.

**Response:** The Structure Plan sets the spatial strategy for Aberdeen City and Shire, which promotes development in places that meet the needs of businesses and, at the same time, are sustainable and take on the challenges of climate change. We have worked closely with Aberdeenshire Council and other service providers and key agencies in the area to integrate the two local development plans and ensure that the cumulative impacts of development are addressed and we take full advantage of any opportunities to share facilities and infrastructure delivery.

**Comment:** Do not consider the presence of oil and gas pipelines a constraint to development.

**Response:** Health and Safety Executive place constraints on developments within the consultation zones of pipelines. Whilst measures can be implemented to reduce risk and increase development opportunity these are seen as additional constraints to development that should be avoided. The required development can be delivered without the need to allocate sites that are constrained by oil and gas pipelines.

**Comment:** If any of the sites promoted in the Main Issues Report contain sports facilities, it is suggested that the requirements of SPP11 should be considered as part of the Local Development Plan process.

**Response:** Agreed, the requirements of Scottish Planning Policy will be incorporated into any Local Development Plan policy.

**Comment:** Changing nature of the oil and gas industry and the impact this will have on Aberdeen. The main hope for wealth creation in Aberdeen is high technology oil & gas services sold to a world market. The very people that are required to do this work can be based in any of the other major oil centres worldwide. At present many chose to be based in Aberdeen for the quality of life this city gives. We sign up to the level of development proposed in this Main Issues Report ("Developers Charter") at our peril.

**Response:** Diversification of the economy of Aberdeen City and Shire will be extremely important over the coming years, and we would agree that enhancing and improving our environment plays a central role in attracting people and businesses to the area. The Economic Manifesto for Aberdeen City and Shire sets the aim for Aberdeen City and Shire - "To be recognised as one of the most robust and resilient economies in Europe with a reputation for opportunity, enterprise and inventiveness that will attract and retain world-class talent of all ages. The location of choice for high value oil and gas and renewable energy organisations, and a first choice for organisations of all sizes operating in other high value, quality niche markets."

Our environment, our accessibility and our hospitality will make Aberdeen City and Shire one of the most interesting and enjoyable locations in the UK in which to visit, live, work and grow up.

Through the Local Development Plan we aim to deliver future development in the most sustainable locations that minimise impact on the environment and at the same time provide a strong framework for investment decisions which help to grow and diversify the economy.

**Comment:** Camphill would request that the process of preparing the Aberdeen Local Development Plan takes cognisance of the potential cumulative impacts of development options on the special needs children and adults served by Camphill.

**Response:** The site assessment process identified any potential land use conflict arising from new development. The comments made regarding Camphill's sites have been considered in the area responses.

**Comment:** The current plan makes reference in paragraph 3.6.1 to the Scottish Office Planning Advice Note 46, "Planning for Crime Prevention". This was superseded in 2006 by Planning Advice Note 77: Designing Safer Places, and should be replaced. I would also suggest that Policy 7: Crime Prevention and Community Safety be reworded.

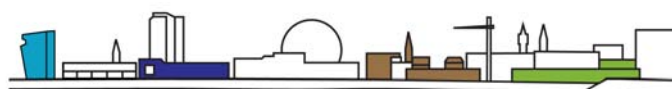
**Response:** Agreed, amendments to current policies will be incorporated into the Proposed Local Development Plan.

**Comment:** Aberdeen City Council's lack of awareness in new technologies to power vehicles must be corrected BEFORE greenfield resources are wasted.

**Response:** Through the site assessment process we have aimed to locate new developments in the most sustainable locations. New developments will be required to deliver new services and facilities within close walking distance to reduce the need to travel. New developments will also include a mix of housing and employment, which will encourage people to live and work locally, again, reducing the need to travel.

**Comment:** It would have been useful to add a paragraph on what makes a successful community, i.e. mixed ages, shops, medical centres, schools, facility for people to meet for clubs, sport, social occasions, open spaces to play, walk or just sit.

**Response:** The Local Development Plan will include policies to promote a mix of uses as a part of new development. In addition the requirements for open space, infrastructure, community facilities will be identified.



## aberdeen local development plan

### Main Issues Report – Consultation Responses

#### Strategy Housing Numbers: Summary of Responses

42 respondents made comments on the specific issue of housing numbers. Below is a list of the comments and the responses to comments. Comments are only summaries, but the full content of each respondents' submission can be found on the City Council's website by going to the following link:- [http://www.aberdeencity.gov.uk/xlp\\_LocalDevPlanSearch.asp](http://www.aberdeencity.gov.uk/xlp_LocalDevPlanSearch.asp)

#### Housing Numbers Comments

There were a large number of responses objecting to the housing numbers that the Local Development Plan is to provide. The majority of comments on this specific issue questioned the premise of the housing targets and felt that they are too high. A summary of the comments in support of the strategy that were made are list below:

- What is the justification for the huge housing numbers?
- Where are the people going to come from?
- The oil industry is predicted to decline in the future.
- Concerned the Council will have little control over the phasing of future developments. Developers will cherry pick from the development sites.
- Existing allocations should be deducted from housing requirements.
- Will the provision meet the specific requirements of the future population?
- Support for growth objectives.
- A risk that more housing will be provided than is actually required.

#### Response to Housing Numbers Comments

The role of the Structure Plan is to set the strategy for development in the area, which includes housing allowances to be delivered through Local Development Plans. The Structure Plan was approved in August 2009 and Local Development Plan must identify sites to meet the housing allowances.

Aberdeen City and Shire is growing. Even since 2005, the population has increased by 18,000 while the number of households has increased by 9,000. This growth is to be welcomed and it is consistent with the aims for the area to grow and diversify the economy, to become an even more attractive, prosperous and sustainable European city region, an excellent place to live, visit and do business.

However, if this is to be sustained, the planning system needs to provide the conditions to facilitate growth. Key to this is the provision of sufficient land for

new households and businesses of the right type, in the right places and at the right time.

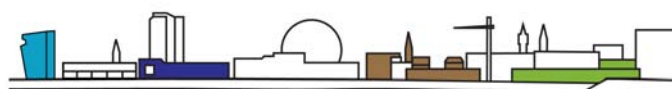
**Response to the comments, an explanation of the justification behind the housing numbers:**

Household forecasts have been developed for Aberdeen City and Shire (Strategic Forecasts 2007). A forecast of future households is made based on population trends and projection of average household sizes. Based on trends it is forecast, between 2006 and 2031, there will be a 25% increase in the number of households in Aberdeen City and Shire. To identify the future housing requirements for the Aberdeen City and Shire area, a forecast of vacancies and demolitions is made and the sum of this and the household forecasts provides a minimum housing requirement.

Vacant stock and second homes + projected demolitions + household estimates = Future Housing Requirement

This calculation projects that to 2031 there will be a minimum requirement for 59,090 new homes. In addition to meeting the forecast requirement, the Structure Plan is based on an aspiration to see the population of the area grow beyond projections, Government objectives to increase house building and a need to enable a more responsive housing market. Therefore, the Structure Plan allowance is for 72,000 new homes to 2031.

The Structure Plan aims to deliver a spatial strategy which promotes development in places that meet the needs of business and at the same time, are sustainable and take on the challenges of climate change. Making housing, employment and services highly accessible by public transport is central to this aim. The strategy is to focus growth in three strategic growth areas: Aberdeen City, Huntly to Laurencekirk corridor and Aberdeen to Peterhead corridor. Based on this strategy and the aims of the Structure Plan around half of all new development in the Structure Plan area is required to be in Aberdeen City.



## aberdeen local development plan

### Main Issues Report – Consultation Responses

#### Strategy: Summary of Responses

34 respondents made comments on the issue of Strategy. Below is a list of the comments and the officer response to comments. Comments are only summaries, but the full content of each respondents' submission can be found on the City Council's website by going to the following link:-  
[http://www.aberdeencity.gov.uk/xlp\\_LocalDevPlanSearch.asp](http://www.aberdeencity.gov.uk/xlp_LocalDevPlanSearch.asp)

#### Preferred Strategy Comments

There were a large number of responses that supported the preferred option and supported the delivery of land for new housing. Many comments just provided a brief statement to indicate that they supported the preferred strategy. A summary of the comments in support of the strategy that were made are list below:

- Will help to redress the balance of population and encourage more families to live and work in Aberdeen.  
Capable of immediate delivery upon approval.
- Is in line with National Planning Framework, SPP, ACSEF Manifesto, Economic Action Plan and the Structure Plan. This increases the likelihood that the Structure Plan Targets will be met.
- Delivering employment land in locations that do not have concentrations creates a better balance and mix of uses.
- This will support the local economy.
- Pragmatic approach to the sustainable accommodation of growth within the city.
- The strategy provides a strong commitment to increasing housing supply and the strategy is in accordance with the Scottish Government's commitments and the Structure Plan requirements. The Scottish Government will continue to support delivery of development.
- Support for the Vision and objectives.
- The strategy is consistent with the economic development priorities as outlined in the ACSEF Manifesto and Economic Action Plan.

There were also a number of objections to the preferred option received the issues raised are listed below:

- Large housing allocations will reduce the quality of the environment, impact on existing infrastructure
- Question the deliverability of the phasing scheme, too much reliance on large sites, should allow smaller sites.
- Question whether the Structure Plan vision and aims have been met through the preferred settlement strategy.



- The housing figures from the Structure Plan have not been met
- The preferred option relies on publicly owned land and this may increase the risk of non-delivery.
- The strategy is piecemeal.

### **Response to Preferred Strategy**

We welcome the support of the preferred strategy.

A large number of houses are required, by the Structure Plan, to be provided as a part of the Local Development Plan. As with any strategy that delivers this level of growth it is expected that without mitigation or interventions there will be a significant impact on existing infrastructure and the environment. Therefore, the developer would be required to make improvements to the transport network and mitigate any significant negative impacts on the environment in the area. In addition the Proposed Local Development Plan will identify the specific transport and infrastructure improvements that are required.

The site assessment process that was undertaken sought to avoid the loss of or damage to any known important environmental features and guide development to the most sustainable and accessible locations to minimise any potential impact.

The Structure Plan requires the Local Development Plan to provide land for a large number of houses. In order to deliver the growth some large sites have been allocated. Part of the reason for choosing the sites that have been included in the preferred strategy relate to the impact on services and infrastructure. There are locations in the City where we can make best use of resources and support existing services. However, in order to accommodate the level of growth required by the Structure Plan there is a need to provide additional infrastructure and services to support an increased population. Dispersal of development across the city, and reliance on smaller sites was not identified in the Main issues report as an alternative as this would not allow for effective delivery of major infrastructure that would be required, cumulatively, as a result of the level of development approved in the Structure Plan.

The strategy for development, including the preferred development sites, was produced following a detailed site assessment process, Strategic Environmental Assessment and Transport Framework assessment. The purpose of these assessments was to ensure that the directions for growth chosen, and the specific sites are those which best deliver the Structure Plan Vision and Aims, and provide a sustainable growth strategy. The Structure Plan strategy means that more than half of new development will need to take place on Greenfield sites. Therefore, it is key that new development helps to reduce travel distances, and makes walking, cycling and public transport more attractive to people.

The preferred strategy for development includes sites that will be phased over the whole Structure Plan period. However, the housing land provided does not

meet the full Structure Plan allowance of 36,000 new homes to 2031. There is no requirement for the Local Development Plan to meet the full housing allowance from the Structure Plan; it is only required to provide sufficient land to meet requirements for a 10 year period following adoption. With a planned adoption date of 2012 the LDP will be required to provide sufficient land to meet the first two periods of the Structure Plan up to 2023.

The ownership of sites varies, but has not guided the decision on which sites are the most suitable. The preferred sites are those that are most suitable for development and can deliver the settlement strategy. Through the use of the Action Programme, which will be published alongside the Local Development Plan, the Local Development Plan team will identify actions and work closely with all developers and landowners to implement the Local Development Plan.

### **Alternative Strategy Comments**

A number of comments related to the alternative strategies and other alternative strategies that were not included in the Main Issues Report. A summary of the comments are listed below:

- A more even dispersal of development across the city is required to minimise potential impacts on the transportation network and increase the likelihood of allocations actually being delivered.
- Alternative strategies identified in the MIR do not conform to the Structure Plan and phase other large sites over a longer time period.
- Include more development at Deeside and more development at Kingswells.
- Promote more development at Peterculter.
- Support more development on Lower Deeside.
- Provide stand alone development, rather than bolt onto existing settlements.
- Support the alternative strategy for employment land delivery; it is a more deliverable option. There is a need to promote the most suitable sites first.
- Employment land should be provided in a range of locations rather than add more land at existing locations.
- Should promote more brownfield development, and encourage brownfield development to take place before greenfield development. This is a more sustainable option.
- Support the alternative strategy for housing as it is more realistic and will allow for slower growth
- Any unused allocations from the Local Plan should be included in the allocations for the Development Plan.

## Response to Alternative Strategy Comments

Part of the reason for choosing the sites that have been included in the preferred strategy relate to the impact on services and infrastructure. There are locations in the City where we can make best use of resources and support existing services. However, in order to accommodate the level of growth required by the Structure Plan there is a need to provide additional infrastructure and services to support an increased population. Dispersal of development across the city was not identified in the Main Issues Report as an alternative as this would not allow for effective delivery of major infrastructure that would be required as a result of development.

We would accept that the phasing of Alternative 2 would not meet the requirements of the Structure Plan and this is one reason why we recommended the preferred strategy.

To accommodate more development in the Deeside corridor or in Peterculter it would require a new secondary school. In order to deliver a new school this would require significant allocations in the area. We do not feel that this area could accommodate this level of growth for two main reasons. Firstly, North Deeside Road could not accommodate the additional traffic and there are constraints to delivering any improvements in this area. Secondly, the River Dee is a Special Area of Conservation (SAC) and development of this scale has the potential to have significant cumulative effects on the water quality and has the potential to adversely impact the integrity of the River Dee SAC.

The majority of the new development areas that have been proposed are of a large scale. This will support a range of facilities and services within the new development, enable the delivery of significant infrastructure improvements, and will avoid the problems that disjointed incremental growth has.

Some of the suitable sites for employment development have been phased ahead of others in the preferred strategy. The reason for this is to allocate sites into areas of the city that do not currently have high concentrations of employment land, such as Kingswells and Deeside. This helps to create a better balance and mix of land uses across the city. Also, in areas where we currently have a high concentration of employment land there are allocations that have not been built and it would be beneficial to allow development to come forward on these site before additional land is released in the area.

Over the past 25 years development on brownfield land has had a significant contribution to housing in Aberdeen. Evidence from development during the mid 1990s suggests that high levels of brownfield development can co-exist with high levels of greenfield development. Whilst the Aberdeen Local Development Plan will only provide brownfield sites for the first phase of the Structure Plan (4,000 homes) the policy approach would support a higher rate of development if the housing market can deliver the sites. Although the Structure Plan recognises the importance of new housing on brownfield sites, it also recognises that greenfield housing is important. Therefore, the Structure Plan strikes an appropriate balance between them. The balance of greenfield and brownfield development has been clearly set out in the

Structure Plan. The Local Development Plan is required by legislation to be consistent with the Structure Plan, and there is a requirement for the Local Development Plan to deliver the approved development strategy that is set out in the Structure Plan.

If the development industry is unable to deliver the Structure Plan requirements or the requirements for housing are not as forecast then the preferred strategy would also support a slower rate of growth. If growth is slower than set out in the Structure Plan developments would be completed over a longer time period. However, if demand is in line with projections or above, there is a need to have a range of sites available to allow the market to respond effectively. The Structure Plan makes it clear in paragraph 4.17 that we cannot expect all the new houses allocated to be built within the relevant plan period.

The housing allocations in the Structure Plan are in addition to all sites that were included in the 2007 Housing Land Audit and all greenfield sites identified in the Aberdeen City Local Plan. Any windfall sites, from 2007 onwards, will count toward the housing land requirements.

### **General Comments on Strategy**

Other more specific comments related to the strategy for development are listed below:

- Additional greenfield releases should be made where a 5 year land supply is not being provided.
- Given the uncertainty about the future demand for housing, the plan should identify which sites would be preferred if demand is lower than anticipated.
- Development should avoid land at risk from flooding.
- The Local development Plan needs to provide information on deliverability and infrastructure requirements.
- The Main Issues Report does not address cross boundary infrastructure impacts.
- Has environmental impact and assessment of the carbon footprint been undertaken?
- What happens if the route for the Aberdeen Western Peripheral Route changes?
- The MIR fails to identify improvements other than housing and employment.
- The preferred options do not provide reasonable alternatives.

### **Response to General Comments**

The Structure Plan has provided generous housing allocations to provide flexibility in the objective of delivering housing requirements and meeting the aspiration to grow the economy and population of the region.

As part of the site assessment process flooding was seen as a constraint to development. There are preferred sites that are constrained by the risk of fluvial or costal flooding. Where there are areas of a site that have flooding

issues, these are minor or it is possible for development to be delivered without building on the area at risk from flooding.

We will publish the infrastructure requirements and how these are to be delivered along with the Proposed Local Development Plan. This will provide the development industry with upfront information on the requirements to plan into the finances of development and will provide the public with clarity on what will be delivered as a part of new development.

Transport modelling has been undertaken, together with Aberdeenshire Council, to assess the cumulative impact of development across the North East region, and to identify the strategic transport infrastructure that will need to be delivered to support this level of growth. The outputs from this work will inform the infrastructure requirements of both the Aberdeen and Aberdeenshire Local Development Plans.

A Strategic Environmental Assessment of the Main Issues Report proposals and strategies has been undertaken to reduce the impact of development on the environment and provide proposals to mitigate any significant impacts on the environment that are identified. Impact on climate formed a part of this assessment.

The route for the AWPR has now been approved and work is ongoing to deliver the AWPR.

Within all new developments, policies will require delivery of additional services, facilities and infrastructure, and will be required to implement environmental improvements where necessary. In addition the Local Development Plan will make specific allocations / provision for: waste facilities, community facilities, access improvements, environmental improvements, retail development, a framework for development in the City Centre, provision of affordable and other specific needs housing, and transportation improvements.

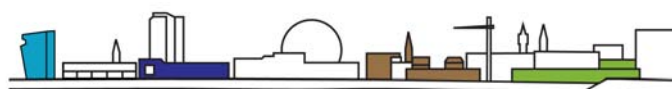
The alternatives identified in the Main Issues Report include many of the same sites as there is limited scope to accommodate development within Aberdeen City and through the assessment process only a limited number of sites were deemed suitable to accommodate future development. However, all the sites that were received as development options have been presented in the Main Issues Report and will have to be considered if any of the preferred sites are not favoured. Through the engagement on the Main Issues Report responses on both the preferred sites and the undesirable sites was encouraged.

### **Overall Response to Strategy Comments**

The response to the overall strategy is mixed with a number of responses in support of the strategy and a number of objections. In addition some alternative options have been promoted which have been considered in the response to the alternative strategy.

The strategy has been chosen after undertaking an extensive assessment process of all available sites for development. The sites that are included in the preferred settlement strategy are those which provide opportunities to: minimise impact on the environment, reduce the need to travel and promote walking and cycling, minimise impact on existing infrastructure or can provide new infrastructure, and can be delivered.

The consultation on the Main Issues Report has provided a great wealth of information on the sites available and the assessments that have been made of these sites. There have been some amendments to the sites that are dealt with in the Area responses. However, the overall strategy for development is to remain broadly in line with the preferred strategy in the Main Issues Report.



**aberdeen** local development plan

**Main Issues Report – Consultation Responses and Officer Response**

**Sustainable Construction Comments: Summary of Responses**

We received 54 responses relating to the Sustainable Construction Main Issue. The types of respondent were classified as follows:

Number	Respondent Type
39	Member of the public
1	Community Council
1	Construction Industry Representative (Homes for Scotland)
8	Landowner/Agent
5	Key Agency (NESTRANS, SEPA, SNH), Scottish Government and ACSEF
<b>54</b>	

**Questions in the Main Issues Report**

Main Issues Report Question	Total no. of respondents *	Respondents generally supporting Main Issues Report	Respondents generally opposing Main Issues Report	Respondents offering advice/comment only
Like to see similar standards across Aberdeen City and Shire	31	32	0	0
Support approach of gradually increasing standards	27	25	2	0
Support wider range of criteria for environmental performance standards	29	30	0	0
Comments	31	17	6	8

**Summary Overview of Responses**

As can be see from the above table, there was wide support and very little objection to the preferred approach to sustainable construction set out in the

Main Issues Report. There was also unanimous support for a regional approach, and criticism from some developers that the goals would raise costs, jeopardising development, and standards should instead be set at the national level. The Scottish Government's own response indicated their intention to embed sustainable construction issues within the Building Standards regime but also their support for development plan policies requiring all new buildings to avoid a specified and rising proportion of greenhouse gas emissions.

Other concerns included a wish to see a more supportive policy framework for renewable energy, including energy from waste and biomass. Homes for Scotland questioned the definition of the term "zero carbon" and the effectiveness of new technologies. SEPA recommend the Council identify potential heat networks, wish to see the avoidance of flood risk as a sustainable construction criteria, support measures to minimise waste arising from construction sites and the incorporation of water saving devices in new developments. SNH wish the supply of sustainable construction materials to be fully considered, including the use of granite from geographically remote locations.

**Response:**

Since the publication of the Main Issues Report it has become clear that the Scottish Government view the Building Standards system as the most appropriate vehicle for delivering many of the sustainable construction themes at the level of the building block, including water conservation and materials. The national implementation of this through the Building Standards system has many benefits and will respond to concerns raised by the construction industry. The Local Development Plan does however still need to include policies requiring all new buildings to avoid a specified and rising proportion of greenhouse gas emissions through the installation and operation of low and zero-carbon generating technologies. The proposed progressive reductions in carbon emissions in the Sullivan Report represent a real challenge for house builders and requiring 2016 standards upon adoption of the Local Development Plan (as some respondents suggested) could jeopardise the delivery of housing in the city.

Aberdeen City Council has submitted a bid for Interreg funding for heat network mapping in the city, using GIS. This work will help us to establish and specify where in the city developments will be able to link into existing or proposed heat networks and where additional plants may be required. We are also looking to set in place a spatial framework for renewables' development in the city and will require the preparation of Site Waste Management Plans to minimise waste at source on construction sites.

**Like similar standards across Aberdeen City and Shire**

*Supporting Comments:*



27 Members of the public expressed their support for the idea of having similar standards across Aberdeen City and Shire. One member of the public noted that we seem to be very far behind other European countries in this area so it is good to see proposals like this included, while another thought the approach would bring greater consistency and clarity.

Scottish Natural Heritage (SNH), Nestrans, ACSEF and Tenants First Housing Co-operative were also in support of the idea.

*Objections:*

None.

### **Support approach of gradually increasing standards**

*Supporting Comments:*

22 members of the public supported this approach.

NESTRANS support the approach but would like the progressive levels to be aspirational - challenging the construction industry to improve within realistic timescales.

SEPA support the approach as it will help Aberdeen improve energy efficiency and reduce the carbon footprint of development. They recommend looking to regional examples to inform the standards for new developments, but also note that greater gains may be made by providing support for energy efficiency in the existing housing stock.

Tenants First Housing Co-operative support the approach.

*Objections:*

1 member of the public objected to the approach, preferring instead to set standards as high as possible at all times not start off low and gradually build up to them.

### **Support wider range of criteria for environmental performance standards**

*Supporting Comments:*

27 members of the public supported having a wider range of criteria.

NESTRANS and ACSEF support the approach and feel that taking account of the life cycle costs is essential.

Tenants First Housing Co-operative support the approach.

*Objections:*

None.

## **Comments**

### *Supporting Comments:*

12 members of the public support the preferred option.

Culter Community Council are in support of the preferred option, but would wish to do away with the gradual increase, introducing the 2016 standard upon adoption of the plan in 2012.

SNH strongly support the emphasis on creating places that are high-quality and sustainable.

SEPA support measures to minimise waste arising from construction sites and the incorporation of water saving devices in new developments. They also welcome the consideration to revise the Council's own building standards, and suggest it could be developed further to identify potential heat networks.

Bancon Developments Ltd support the "Code for Sustainable Homes approach" advocated by the Council and maintain that they currently use it to assess all of their developments.

Knight Frank LLP on behalf of Kilmartin Property Group support the preferred option, stating that it would allow the construction industry to gear up for the changes. They also believe Stoneywood provides a rare opportunity to create an exemplar large scale sustainable mixed use development within the urban area.

The Scottish Government welcomes the intention to reduce energy consumption in new development, but favours the approach of embedding sustainability in the mandatory building standards system. The Scottish Government refers us to Section 72 of the Climate Change (Scotland) Act 2009, requiring development plans to include policies requiring all new buildings to avoid a specified and rising proportion of greenhouse gas emissions, and states that the Building Standards Division is looking to further define measures of sustainability (not just energy) that could be verified and enforced via the building standards system.

### *Objections:*

Emac Planning on behalf of Scotia Homes Ltd object that the goals may be difficult to attain and costly, which may hamper development in such times as the present.

Grampian Housing Association Ltd and Langstane Housing Association both object that better standards should be developed and delivered on a national

scale by means of building regulations. Similarly, Stewart Milne Homes maintain that assessments of developments' environmental performance should be Scotland wide and regulated by Building Regulations rather than the planning process.

Homes for Scotland object that emerging technologies are untested, unproven and the concept of zero carbon not clearly defined. Therefore, they argue, it would be inappropriate for Development Plan policy to insist on the use of such technologies.

Jones Lang LaSalle on behalf of Scottish and Southern Energy PLC and its Group Companies object that the Main Issues Report does not provide the guidance or anticipate the potential regarding renewables development. The policy framework can be used to help contribute more significantly to achieving greenhouse gas reduction and renewable energy generation targets.

*Comments:*

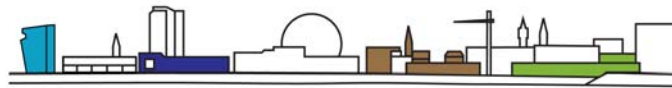
SEPA would wish to see more explicit mention of recovering energy from waste and biomass, which may be licensable activities. SEPA would also like to have seen flood protection mentioned in the Sustainable Construction section of the Main Issues Report, as avoidance of flood risk is the most sustainable approach for all new development.

SNH wish the supply of sustainable construction materials to be fully considered. In particular the desire to use granite in building design recognising the vernacular architecture of much of Aberdeen City and Shire, which has to be balanced with the unsustainable quarrying of granite from local quarries or sourcing of granite from geographically remote locations, is also unsustainable e.g. Cornwall, China etc. This possible conflict should also be considered with respect to any Design Standards imposed.

Comments from 5 members of the public raised the following issues:

- Developments should be self contained, have renewable energy, cycle lanes and allotments attached.
- We need to see substantial improvements in the sustainability of new developments and I would support an early start to this process to encourage the construction industry to gear up.
- Encourage Aberdeen City Council to make sustainable and renewable options a primary priority. Think beyond the present needs only, please.
- There has to be a balance between cost and actual benefit.
- Energy efficiency is most important.
- Stick to the Structure Plan target for carbon-neutral buildings by 2016.
- A gradual increase in standards over the twenty years of the plan means the earliest developments will be out of date by the time the newer developments are complete.





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**Main Issues Report – Consultation Responses**

**Transport and Accessibility: Summary of Responses**

<b>MIR Comment/Question</b>	<b>Number of Comments</b>	<b>Support</b>	<b>Object</b>	<b>Comment</b>
Transport Framework	53	36	15	3
Strategic Infrastructure	24	-	2	22
Parking	5	1	1	3
Public/ Active Travel	26	4	-	22
Other	16	1	2	13
<b>Total</b>	<b>124</b>	<b>42</b>	<b>20</b>	<b>62</b>

Each policy question relating to transport and accessibility have been split into sub-issues. A summary of the issues arising from comments have been listed, and these are split by supporting comments, objections and comments. Supporting comments are comments which support the conclusions in the MIR.

**Source of Responses**

A total of 123 comments were received relating to transport and accessibility. These responses came from:-

- 62 Individuals;
- Cove and Altens Community Council;
- Culter Community Council;
- Bridge of Don Community Council;
- Torry Community Council;
- Cults, Milltimber and Bieldside Community Council;
- Mastrick and Sheddocksley Community Council;
- Kingswells Community Council;
- The Scottish Environment Protection Agency;
- Scottish Natural Heritage;
- The Scottish Government;
- Aberdeen Chamber of Commerce;
- Homes For Scotland;

- Langstane Housing Association;
- Grampian Housing Association;
- British Airport Authority Aberdeen;
- Aberdeen Harbour Board;
- Aberdeen Cycle Forum;
- NESTRANS;
- SportScotland;
- ACSEF;
- Civic Forum; and
- 19 submitted on behalf of development industry/land owners.

## 1. Summary Overview of Responses

### Transport Framework

#### *Supporting Comments*

34 supporting comments were received in total. 15 members of the public, Scotia Homes Ltd, SEPA, SNH, Mastrick and Sheddocksley Community Council, Stewart Milne Homes, Ryden LLP, Langstane Housing Association, Strutt and Parker, Aberdeen Cycle Forum, Knight Frank LLP, Grampian Housing Association, NESTRANS, Culter Community Council, Cove and Altens Community Council and Kilmartin Property Group all made comments that were supportive of the MIR approach.

- Support the principle of the Transport Framework and believe it can help to deliver sites which offer the most potential for linking to sustainable modes of transport.

#### *Objections*

15 comments were received that objected to the Transport Framework approach. These were received from, 8 members of the public, Homes for Scotland, Scotia Homes Ltd, SEPA, Halliday Fraser Munro and Richard Bush (Chartered Town Planner).

- The Transport Framework only deals with existing transport infrastructure and those identified in the Local Transport Strategy; it should have looked at future transport/infrastructure requirements.
- The assessment criteria used in the Transport Framework are not relevant to all types of development.
- None of the assessment criteria are weighted and the criteria are not of equal relevance.
- The use of Accession software is too restrictive and not relevant.

#### *Comments*

3 general comments were received about the Transport Framework; these were from the Scottish Government, Culter Community Council and the Civic Forum.

- The impact on the transport infrastructure needs to be assessed on a city-wide basis and in conjunction with the Shire
- The Proposed Plan should be informed by the outcome of the cumulative modelling exercise.
- The alternative option to the Transport Framework approach is not supported.

*Response*

We welcome support for the Transport Framework, particularly the recognition of the need to integrate land use planning and transport issues. The purpose of Part A of the Transport Framework was specifically to assess the compatibility of each Direction for Growth to existing transport infrastructure. The criteria used were created by condensing the Local Transport Strategy objectives. These were intended to form a view on the suitability of existing transport infrastructure to accommodate development within each Direction for Growth, as opposed to individual Development Options. The criteria were not given weighting according to their perceived importance because the scores were not used to rank the suitability of Directions for Growth.

The stages of Part A of the Transport Framework process were as follows:

- The first stage was the Transport Appraisal, which appraised the existing transport network within each Direction for Growth against the criteria formulated from the Local Transport Strategy objectives (as described above);
- In the second stage the results from the Transport Appraisal were fed back to the LPD Transport Group, who gave their views on the ability of each Directions for Growth to accommodate growth and to identify the likely need for additional infrastructure to support development;
- The Council also commissioned strategic transport modelling (ASAM4) to forecast the impact of growth proposed in the first two phases (2007–2016 and 2017–2023) of the Aberdeen City and Shire Structure Plan. The modelling took account of committed transport infrastructure including the Aberdeen Western Peripheral Route (AWPR), third Don crossing, Haudagain roundabout improvements, Bus Park and Ride and strategic rail improvements, among others. The results concluded that the level of growth proposed in the first two phases of the Structure Plan can be accommodated.
- The combined results from the Transport Appraisal, feedback from the Local Development Plan Transport Group and initial transport modelling, has helped us to consider the likely impact of development in each of the Directions for Growth. Together with the other assessment criteria, it also informed decisions over which sites to allocate as Preferred Options in the Main Issues Report.
- In addition, the Accession software tool was used as part of the Development Options exercise to assess the accessibility of sites to various services and facilities. The policy framework in the Proposed Plan will set out further details on how Accession software could shape future development.

Following publication of the Main Issues Report, the Council were already working on Part B of Transport Framework which built upon the Part A results by using more detailed transport modelling techniques to help identify the strategic infrastructure requirements for the Preferred Options sites.

This stage also helps to consider the cumulative impact of development in the City and Shire and will help us to identify the extent to which sites within Aberdeenshire may need to contribute towards infrastructure within the City, and vice versa. Further local transport interventions may be required to mitigate and support new development and these will be identified through the Local Development Plan and through the masterplanning process.

## **Strategic Infrastructure**

### *Objections*

2 comments were received from members of the public.

- Object to level of new development as the infrastructure in Aberdeen City is inadequate.

### *Comments*

22 general comments were received about Strategic Infrastructure; these were from, 14 members of the public, the Civic Forum, British Airport Authority Aberdeen, Bridge of Don Community Council, Kingswells Community Council, Aberdeen and Grampian Chamber of Commerce, Aberdeen Harbour Board and Richard Bush (Chartered Town Planner).

- The AWPR is not justified.
- No consideration has been given to the fact that the AWPR may be abandoned, delayed or re-aligned.
- Development should only go ahead after the AWPR, Haudagain and 3<sup>rd</sup> Don Crossing have been built.
- Additional road infrastructure should be considered.

### *Response*

The Local Development Plan is required to allocate sufficient land to meet the growth targets set out in the Aberdeen City and Shire Structure Plan. The Future Infrastructure Requirements for Services (FIRS) process will identify the level of additional infrastructure that will be required to accompany new development.

The AWPR was approved by Scottish Government in December 2009 and forms part of the Strategic Transport Projects Review, Regional Transport Strategy and Local Transport Strategy. Land has been safeguarded for the proposed route and this will be identified in the Local Development Plan.

Every development site will be required to mitigate against adverse impacts on the transport network before development can proceed. If any particular phase of development is dependent on the AWPR and other transport infrastructure being in place then the development of the site will reflect the



timescales set by that piece of infrastructure. The transport modelling will provide evidence to help identify the strategic infrastructure requirements for the Preferred Options sites.

## **Parking**

### *Supporting Comments*

1 supporting comment was received from SEPA.

- Welcome the inclusion of parking policies as they will encourage the move towards more sustainable transport options.

### *Objections*

1 objection was received from a member of the public.

- All developments irrespective of type should plan for the minimum of two cars per household off street parking, anything less, with the exception off student accommodation is totally negligible.

### *Comments*

3 general parking comments were received from members of the public.

- The presumption against off street parking should be exempt for small scale visitor parking.
- Parking spaces are important but it is also important to have streets that are wide enough for waste collection vehicles, etc.
- There must be adequate facilities for car parking.

### *Response*

The Transport Framework aims to promote sustainable transport in order to achieve sustainable growth. The availability of parking can have an important influence in reducing reliance on the car. Appropriate maximum parking standards will be applied to on-site parking at new developments to encourage modal shift. These will be set out in Supplementary Guidance and will reflect the individual development requirements. Where an area is well served by sustainable transport modes, more restrictive standards may be appropriate.

The comments in relation to on-street parking have been noted for consideration in any future parking strategy. There may be instances where on-street parking can form a viable part of the design of new development. Any on-street parking requirements will be designed in accordance with Designing Streets principles.

## **Public Transport and Active Travel**

### *Supporting Comments*

4 supporting comments were received from, 1 member of the public, Scottish Natural Heritage and SportScotland.

- Support the need for cycle routes and cycle parking to be protected and provided for in development.
- Welcome the comments on reducing travel distances and making walking, cycling and public transport more attractive.
- Support the six main issues identified as main transport/accessibility issues.
- Agree with the need to provide walking and cycling routes.

#### *Comments*

22 general comments were received in relation to public transport, walking and cycling. These were from, 13 members of the public, Torry Community Council, Cults, Milltimber and Bieldside Community Council, Bridge of Don Community Council, British Airport Authority Aberdeen, NHS Grampian, Aberdeen Cycle Forum and the Civic Forum.

- There are no real alternatives to the car.
- The public transport system in Aberdeen is a monopoly and very expensive.
- All new developments must be served by public transport and walking and cycling infrastructure.

#### *Response*

We welcome supporting comments in favour of public transport and active travel to/ within new developments. Bus services and walking and cycling infrastructure will ensure that a range of sustainable and healthy travel choices other than the car are available to people who live, work and visit Aberdeen.

We note the comment with regard to the public transport system in Aberdeen. Bus services in the UK are run by commercial operators. The role of the City Council is to work with these operators to seek the delivery of an efficient, affordable and comprehensive bus service for all. Bus operators have been involved in the Local Development Plan through the Local Transport Group.

### **Other Comments**

#### *Supporting Comments*

1 supporting comment was received from Aberdeen Harbour Board.

- Agree with the recognition given in the Main Issues Report to the importance of the harbour as a transport gateway and that land adjacent to the harbour should be discounted for potential housing use.

#### *Objections*

2 objections were received from members of the public.

- The report mentions a number of 'issues' relating to sustainable transport, but provides no solutions. Given the track record of

developers and authorities, why would the proposed sites be anything other than 'car-based developments'?

- Too much emphasis is being placed on ridding new development of the car.

#### *Comments*

13 general comments were received from, 9 members of the public, NESTRANS, Scottish and Southern Energy Plc and Scotia Homes Ltd.

- It will be important to assess how neighbouring Directions for Growth are linked and any barriers that there may be for movement between them.
- Transport modelling is not always accurate as it often takes multi-modal solutions into account which are ultimately not deliverable.
- It will be important to include a policy framework to support the likely port developments or expansions that may be required to support the transportation and fabrication components for the offshore renewable energy developments.
- The need for Aberdeen to have efficient transport links to UK, Europe and the rest of the world cannot be overstated.
- There is a lack of confidence in the Council's ability to deliver the required infrastructure.
- Developments should be mixed use as they can have a big impact on transport and accessibility.

#### *Response*

We welcome the comments in relation to the Harbour; it is an important transport gateway and plays a vital role in the regional economy, and its working environment should be protected. We also note comments highlighting a need for the policy framework to support port developments or expansions. Whilst the harbour does include passenger ferry services to Orkney and Shetland Islands, its main function is in supporting the needs of local business and industries.

The Transport Framework aims to promote sustainable transport in order to achieve sustainable growth. Development frameworks and masterplans will be required for each development, and development will need to be accompanied by the infrastructure and services required to mitigate the impact of that development. This includes bus services and walking and cycling infrastructure to ensure that a range of sustainable and healthy travel choices other than the car are available to people who live, work and visit Aberdeen.

The Future Infrastructure Requirements for Services (FIRS) process will identify the level of additional infrastructure that will be required to accompany new development.

Connectivity is an essential part of achieving a sustainable pattern of development, both between individual developments and across the City as a whole. Future work on the Transport Framework and the emerging policies of the Local Development Plan will help to achieve this. In addition,

masterplanning will assist in delivering joined up development in order to create sustainable mixed communities.

The Council also commissioned strategic transport modelling (ASAM4) to forecast the impact of growth proposed in the first two phases (2007–2016 and 2017–2023) of the Aberdeen City and Shire Structure Plan. The modelling takes account of the latest travel trends and forecasts in order to predict the likely impact of development on the transport network. It also assesses the potential benefit of strategic transport interventions to help the Council and its partners to identify the range of interventions which together provide the most effective means of mitigating the impact of the Preferred Options sites.

Further local transport interventions may be required to mitigate and support new development and these will be identified through the Local Development Plan and through the masterplanning process.

We acknowledge the comments relating to the need for efficient transport links between Aberdeen to the rest of the UK, Europe and the rest of the world.

## **2. Summary of Consultation Event Comments**

### **Airyhall Primary School Consultation Event** **2<sup>nd</sup> November 2009**

- Concern that the development proposed is dependent on delivery of the AWPR and that roads are already at capacity and can not take additional traffic.

### **Milltimber Primary School Consultation Event** **11th November 2009**

- Concern that the development proposed is dependent on delivery of the AWPR and that roads are already at capacity and can not take additional traffic.
- What are the plans for the extra traffic that will be generated on North Deeside Road?
- Need more details on how developments will work in practice, especially in road traffic terms.

### **Stoneywood Primary School Consultation Event** **16th November 2009**

- There were concerns regarding traffic entering the city and what new development would do the road network.
- An extra train station in the Stoneywood/Bankhead or Mugiemooss area is desirable.
- A bridge over the Don connecting Whitestripes to Dyce is a good idea.
- Some minor roads surrounding Dyce could be upgraded to allow more efficient shortcuts for city workers.
- Opening new Don crossings at peak times only would help to alleviate traffic congestion but would allow local communities beside them some respite from traffic at other times.
- The WPR should be built prior to any new development.

### **Cults Primary School Consultation Event** **19th November 2009**

- Lower Deeside has a lot of problems with traffic congestion, speeding, and an overall volume of traffic. Where is all the new traffic resulting from these developments going to go?
- Why would you choose preferred sites which are miles away from existing bus routes?
- How can developers be made to pay for road improvements into Aberdeen? Especially traffic resulting from the Countesswells development. It seems like in the past developers have got away with not paying.

- Everyone from Kingswells/Westhill uses the Lower Deeside road network, causing congestion plus the cars tends to speed.
- The traffic at present is unsatisfactory at Friarsfield. Especially as parked cars block the road, impeding the flow of traffic.
- It is essential that connections between Friarsfield and Craibstone are considered thoroughly.
- It is reassuring to hear that you are taking transport so seriously
- Affordability of public transport is an issue. It is very expensive go get in and out of town. This is impacting on our children who aged 16 have to pay adult prices. It is cheaper to driver our children into town than for them to get the bus.
- To compare Aberdeen to Edinburgh, we have the same bus company yet very different pricing, the park and rides in Aberdeen are nowhere near as successful as Edinburgh. Aberdeen is 20/30 years behind Edinburgh regarding transport, park and ride, parking charges.

**Scotstown Primary School Consultation Event**  
**23rd November 2009**

- Third Don Crossing may be needed but roads beyond it into the city centre require improvement.
- Persley Bridge should be dueled with over passes over the Haudagain.
- The retail proposals at the Haudagain will fill up the roads there with cars again – the situation will be not better.
- There should be no parking on Mugiemooss Road – this would free up traffic flows
- Not convinced that the WPR will happen.
- Back roads to the Parkhill junction and to Dyce needs to be improved
- Parkway could be widened, but it is not possible to do so along its entire length.
- When new roads are built, there should be enough space left for future expansion.
- A flyover should be considered from the Parkway and over the Haudigain roundabout.

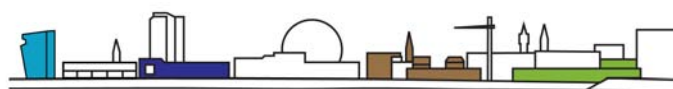
**Kingswells Primary School Consultation Event**  
**24th November 2009**

- The residents of Kingswells are trapped because of the roads.
- Traffic coming from the Shire blocks our roads.
- People in Kingswells should be able to access the AWPR easily.
- How do Aberdeen City Council get money to pay for the roads? It should come from Aberdeenshire.
- Buses do not take people in Kingswells anywhere other than the city centre.

- There is lots of traffic congestion on the Lang Stracht, especially at the Dobbies site.
- An accident out at Blackburn can cause major traffic problems in Kingswells as people use it as a diversion route.

**Culter Primary School Consultation Event**  
**25th November 2009**

- There are serious traffic congestion issues with Oldfold farm.
- Surely all of these sites must be completely dependant on the AWPR being built. What will happen if the route isn't built?
- The position of traffic lights at Bielside cause serious traffic congestion problems.
- Parking along the Deeside road is a huge problem. People park outside the ATM at the bank and make it very dangerous for other drivers and pedestrians.
- The existing bus service is good, it is frequent and reliable. However, it does not offer people a cross country service and it does not offer a real alternative to the car for journeys which are not directly into the city centre.
- There are no dedicated cycle routes/pedestrian walkways.
- Why is there no development in Culter? New developments could be accessed from the AWPR junction.
- Will the AWPR take lorries off local roads as there are currently a lot of local lorries.



**aberdeen** local development plan

**Waste Comments**

There were 132 comments on waste from 62 respondents. Most were from members of the public but we also got comments from the following;

- SEPA
- SITA
- NESTRANS
- Culter Community Council
- Cove and Altens Community Council
- Bridge of Don Community Council
- Grampian Housing Association Ltd
- Scottish and Southern Energy
- ACSEF

Issue / comment	Number of comments	Support	Object	Comment
Waste Site at Altens East and Doonies	33	28	3	2
Supplementary Guidance	13	12		1
Eco Park	19	14		5
Reducing waste to landfill	31	31		
Alternative Sites	6			6
Other comments	30	5		25
<b>Total</b>	<b>132</b>	<b>90</b>	<b>3</b>	<b>39</b>

**Altens East and Doonies**

Most respondents were positive about this proposal with the suggestion that it is around the right size for facilities proposed, provides more certainty and encourages us to be more proactive on recycling. There were concerns on traffic movements however as well as effects on nearby farm animals, houses and employment areas and that access is not ideal from the north. One person suggested a more remote site or derelict industrial land should be used instead.



**Response**

The support for identifying this site for waste facilities is welcomed. In respect of the objections it should be noted that waste facilities are generally considered acceptable uses on Business and Industrial Land (BI68) and that this land is already zoned as such in the current local plan. Modern waste facilities have to be licensed by SEPA and operate to a very high standard. They should not have any more adverse effects than other industrial processes that could be considered suitable on the site. However, it is understandable that people can be concerned about such facilities and one of the advantages of the site is that it is located well away from the main residential areas.

Any planning application is likely to require a transportation assessment which will look at detailed access arrangements. It is accepted that access from the north is not ideal. However, in other respects this is considered to be an appropriate site and that issue in itself does not warrant a change of approach. In respect of the last point, there is only a limited amount of derelict industrial land available in the city and it tends to be in older and more established industrial areas within the built up area. As mentioned, this site is away from the main residential areas. No other remote sites have been suggested.

**Supplementary Guidance**

The use of supplementary guidance to help us plan for waste was supported. It was pointed out that we need to underpin it with a policy in the local development plan, it should be easily understood and that we also need to be site specific as well. Areas covered should include storage areas for waste in new development and regional waste facilities. One person mentioned that although it may not be popular we still need to plan for waste. It was stated that new multi-occupancy developments should consider space for recycling and ease of access thereto.

**Response**

The support for supplementary guidance on waste issues is welcome. There are two areas where we feel that Supplementary Guidance is appropriate. Detailed guidance on the location of regional facilities such as energy from waste and landfill will be produced by the Strategic Development Planning Authority. This will be used to guide their location. We agree that they need to be underpinned by a policy in the Local Development Plan.

We also think that new developments should provide enough space to handle any waste arisings – specifically recyclables, composting and residual waste and adequate access thereto. Planning conditions are already imposed on proposals likely to generate a significant amount of waste e.g. public houses, restaurants, medium to large-scale retail outlets and offices. However more could be done at the design stage to ensure that adequate provision is made for such facilities. We intend to provide further details on this issue in Supplementary Guidance.

## **Eco Park**

The concept of an Eco Park where waste and environmental industries can be located together was supported. Benefits include the joint use and co-location of facilities which in turn is more efficient. Suggestions on locations include industrial areas but not in existing areas zoned for development or housing areas. One person suggested East Tullos already fulfils this role. Specific locations mentioned in Aberdeen were;

- Altens East and Doonies
- Bridge of Don (2)
- Energetica Corridor
- East Tullos (2)
- West Hatton near Kingswells

## **Response**

On further consideration we now question the need for a specific Eco Park given that there is a general acceptance that waste industries are acceptable in industrial locations. Altens East and Doonies are considered good locations for waste facilities but whether it is large enough, or even needs such a designation is doubted. No firm proposals for an Eco Park came from developers other than the offer of West Hatton at Kingswells as a possibility. Because of possible bad neighbour implications however, this may not be appropriate in such a gateway location close to Kingswells. In some respects, the comment that East Tullos already fulfils this role is correct given the amount of waste related businesses there. We therefore feel that Aberdeen's waste requirements can be accommodated without a specific Eco Park being identified.

## **Reducing Waste to Landfill**

There was universal agreement that this is a good thing. It reflects national guidance and the Zero Waste Plan. It needs an overarching policy supporting the waste hierarchy. However, we also need to consider non-municipal waste and should look at new technologies including pyrolysis and gasification. We need to take account to the Thermal Treatment from Waste Guidelines 2009 produced by SEPA. There will still need to be a policy controlling landfill as it will continue to be required in future – albeit much less than now. We also need to provide more information on the effects of new facilities on people's homes and workplaces.

Other more specific comments made were;

- We should encourage the use of renewable energy technology.
- Energy from waste needs to connect with the electric grid and provide heat and power to neighbouring uses.
- We should see waste as a resource and highlight economic benefits that could arise from it.
- We need to plan positively for energy from waste.
- Whitestripes is a good location for an incinerator.

**Response**

Residual waste (waste that is not recycled or composted) will continue to be collected from black wheelie bins and street bins. At all times we should view even residual waste as a resource and attempt to derive value from it in the form of energy capture. The means by which residual waste will be treated will be determined through a Best Practicable Environmental Option analysis carried out by waste officers which will consider all available technologies including incineration, gasification and pyrolysis of waste. We also agree that the Thermal Treatment from Waste Guidelines 2009 produced by SEPA are a material consideration. Industrial sites with the potential for connection to the electricity grid and with potential users of heat or power are likely to be suitable locations for energy from waste. More detailed guidance on the location for such facilities will be produced by the Strategic Development Planning Authority who are preparing Supplementary Guidance on regional waste facilities. This will be underpinned by a policy in the Local Development Plan.

**Sites for Recycling**

There were few areas and no specific sites suggested for recycling centres. Areas mentioned include Bridge of Don (twice), in the west of the city for Deeside residents, a central brownfield location and to the south of the city. One area in Aberdeenshire was suggested north of Bridge of Don.

**Response**

It is accepted that the west of Aberdeen needs more recycling centres. At the Housing and Environment Committee of 13 April 2010, members considered a report outlining the results of a consultation exercise relating to potential sites for a new Recycling Centre in the west of the city. A preferred site was identified on the north west corner of the Grove Nursery site in Hazlehead, accessed from Hazlehead Avenue. The site is readily accessible and could be well screened by the existing tree belts. In addition they recommended that the Greenferns Recycling Centre is retained within the masterplan for Greenferns and is developed as soon as roads and services are established to the site.

It is also accepted that the recycling centre at Scotstown Road in Bridge of Don is not fit for purpose and needs replacing – mainly because it is not large enough and access is poor. We would agree that Bridge of Don needs a recycling centre. We would suggest that a site on Denmore Road on the cleared area next to the playing fields would be an appropriate location as it is large enough for the facility and is easily accessed from Denmore Road. As part of the scheme, car parking could be provided for the football club there. Adequate screening should be provided to protect the amenity of the houses on the opposite side of Denmore Road. Because this area is currently zoned as Urban Green Space, the policy would require the replacement of the open space in the vicinity of the site. It may therefore be appropriate to turn over the current facility at Scotstown Road to Urban Green Space which would allow it to be incorporated into the wider open space area at East Woodcroft.

There is already a recycling centre provided at East Tullos serving the south of the city. It is accepted that it can get very busy at times. However, the development of the other recycling centres – especially to the west – should take some pressure off East Tullos at busy times.

These sites should provide Aberdeen with adequate cover for recycling centres and we feel there is no need at present for a further facility in a central brownfield location. In any event, it may be difficult to identify an appropriate site within the central built up area without affecting surrounding uses.

### **Other comments**

Most other representations were supportive of the approach taken in the Main Issues Report or offered specific comment in respect of our approach.

- We need a policy showing where waste facilities will be acceptable in principle.
- Existing waste sites should be safeguarded in the Local Development Plan.

### **Response**

Agree. Currently proposals for waste management facilities that are housed in a building will be acceptable on Business and Industrial Land (BI68) and we would intend to continue that policy. We would also wish to identify both existing waste sites (such as Hill of Tramaud) and the sites considered suitable for the waste management facilities needed to implement the Aberdeen Waste Strategy.

- Reference to the proximity principle is welcome.
- Supports the movement of waste up the waste hierarchy.

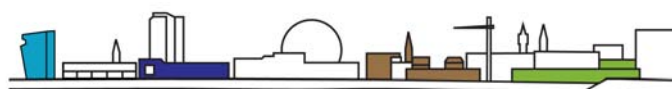
### **Response**

Support welcomed. We would wish to identify a network of waste management facilities which implements the waste hierarchy in Aberdeen in the Local Development Plan. Policies should ensure that proposals for waste management facilities within the Aberdeen City area must comply with the waste hierarchy and proximity principle.

- Household waste should be turned into oil.

### **Response**

This is not a matter for the Local Development Plan. However, any proposal for such a facility would normally be acceptable in areas zoned for Business and Industry (BI68).



**aberdeen** local development plan

**Main Issues Report – Consultation Responses and Officer Response**

**Environment Policy Comments: Summary of Responses**

We received 6 responses relating to environment planning policy and not about specific sites. The types of respondent were classified as follows:

Number	Respondent Type
1	Member of the public
1	Community Council
4	Key Agency (SNH, SEPA), Scottish Government and RSPB
6	

**Preferred sites in the Main Issues Report**

Respondents generally supporting MIR	Respondents generally opposing MIR	Respondents offering advice/comment only
2	1	3

As there were only a few responses relating solely to environment planning policy, the comments have been listed in full and the officer response given below each.

**Responses**

SNH - We strongly welcome the whole thrust of the environmental sensitivities paragraph, especially where it recognises the role of green networks in catering for the needs of both people and wildlife.

Specific recognition of your duty to promote biodiversity would perhaps have made this paragraph even stronger, because it would have emphasised the need to not merely retain a net balance of environmental capital, but also to retain that capital in good condition. Thus a key aim of the new plan should be to maintain habitats, green corridors and designated sites (both local and national) in favourable condition or else manage them to move towards achieving favourable condition.

SNH believes the Council needs a clear mechanism to take forward the Open Space Audit so it can contribute to designing greenspace into new developments. The Audit suggested widespread deficits in amount of greenspace generally and a shortage of certain types of open space.

Response:

The results of the Open Space Audit are informing the development of an Open Space Strategy, including proposed new standards for the provision of open space in new development. That provision will respond to deficiencies in specific types of open space, as identified in the Audit. We welcome SNH's continued input to the Open Space Strategy, through the Open Space Working Group.

SEPA expect new development not to prejudice the ability of water bodies maintaining or achieving good ecological status through the Scotland River Basin Management Plan (RBMP). They expect detailed policies to protect the water environment and these should refer to the requirements of the Water Framework Directive (WFD) and to the RBMP. In particular, they wish to see policies that maximise opportunities and avoid/mitigate against any threats to waterbodies identified under pressure in the RBMP. As such policies should protect the physical and ecological status of the water environment and ensure avoidance of adverse impacts including hydrological and hydromorphological processes. SEPA note that when assessing development proposals, the Council has a duty to take into account the RBMP for the Scotland River Basin District, relevant Area Management Plans and supporting constraints-related datasets available. Planning authorities are legally designated responsible authorities in respect of WFD interests and as such 'must exercise their designated functions so as to secure compliance with the requirements of the Directive' (Section 2(2)(i) Water Environment and Water Services (Scotland) Act (WEWS) 2003).

SEPA also request that the Plan shows due regard to their Position Statement on culverting (available from [www.sepa.org.uk/water/regulations/guidance/engineering.aspx](http://www.sepa.org.uk/water/regulations/guidance/engineering.aspx)). The Water Environment (Controlled Activities) (Scotland) Regulations 2005 (CAR) place a new duty on SEPA to ensure water bodies achieve and maintain 'good ecological status'. Traditionally the emphasis has been on water quality, but the CAR provisions seek a more holistic approach. Waterbodies should now have good ecology, and natural morphology and banks. Under the engineering provisions of CAR, any necessary bank protection works, bridges and in-stream structures now require licensing. Crossings which leave the banks and the bed of the watercourse in a natural state are preferred to culverts, and 'green bank' protection is preferred over 'gray bank'.

SEPA - The current Local Plan Policy 24: Planning & Flooding requires adequate provision for access to watercourses for maintenance. We request that any revised policy refers to 'water bodies' rather than watercourses and that justification for buffer strips should not just be for maintenance. They also reduce risk of flooding, mitigate diffuse water pollution, provide valuable wildlife corridors and provide space for lateral movement of watercourses.

In order for SUDS and buffer strip policies to work effectively, we request that existing and future allocations be reviewed in terms of capacity to provide adequate space for such infrastructure before final allocations appear in the Plan.

Response: The current Local Plan addresses the potential impact of development on waterbodies under the Flooding section and the Natural Heritage section. In connection with buffer zones, the effect of the current plan requiring maintenance access under the one section and promoting riparian buffer zones in another has been a lack of clarity. It is therefore our intention to more closely align the two sections and guidance, and avoid repetition. In connection with culverting, the "presumption against excessive engineering and culverting" and promotion of "the restoration of culverted or canalised watercourses" in the Natural Heritage section can also be incorporated in the revised policy and reference made to the requirement for authorisation from SEPA and their position statement and guidance. The revised policy will refer to the requirements of the Water Framework Directive (WFD) and to the Scotland River Basin Management Plan, and ensure that water quality and good ecological status are maintained. The word 'watercourses' can be replaced with 'waterbodies', as requested by SEPA. It is our intention to carry forward the current SUDS policy into the new LDP, coordinated through the masterplanning process and development management.

SEPA - No distinction has been made in the Main Issues Report for the preferred sites which have extant planning permission. For those Category A and B those sites which have extant planning permission we will not object to their inclusion as Plan allocations if we have been consulted at the planning application stage and did not formally object. However, in order to inform any future development proposals on these sites, we consider that a clear statement should be included in the LDP with these allocations highlighting to any potential future developers that a detailed Flood Risk Assessment (FRA) would be required for any new planning application that was submitted for such sites or, where a site has outline consent, a statement should be included in the LDP indicating that a FRA will be required as part of, or in addition to, any approval, consent or agreement required any condition imposed on the grant of the permission.

A member of the public supported the undesirable assessment of sites which are on the floodplain. There are concerns about the not preferred plans of building along the floodplain of the River Dee. The river already bursts its banks and building there is not only unsafe and dangerous but also stupid. The costs would be enormous. Added drainage from higher level building will increase the problem as more soil gets covered over by tarmac hence preventing natural drainage.

Response: Flood Risk Assessments will be required for all development proposals which are themselves at a medium to high risk of flooding, or where they are likely to result in a material increase in the number of buildings at risk of being damaged by flooding.

SEPA - The Plan needs to include policies to ensure protection and improvement of air quality. Development strategies within the Plan which implement principles of sustainable development (including accessible public transport choices, buffers from main roads, land use patterns that minimise

the need to travel to work or education) are crucial to delivering air quality objectives. We note that there is an air quality policy in the current Local Plan and request that this is taken forward to the new Plan and that the matters outlined above and within section 1, Appendix 2 are addressed. If this is undertaken we are unlikely to object to the Plan.

Whilst the ER highlights the majority of issues that we expect to see in relation to air quality, we are disappointed that the MIR does not contain any links to the Council's Air Quality Management Area or the associated Action Plan. We are disappointed to note that there is no mention in paragraph 3.8 of poor air quality being a physical constraint. Likewise paragraph 3.9 considers Environmental Sensitivities, but again there is no reference to poor air quality.

There is also no mention of poor air quality in the city centre that has been caused by emissions from road traffic. The summary on page 5 includes a reference to reducing the emissions of carbon dioxide, but there is no reference to the poor air quality that exceeds the EU and domestic air quality objectives that are being exceeded in the city centre.

Response: We intend to carry forward the Local Plan policy on Air Quality into the Local Development Plan and are currently drafting more detailed Supplementary Guidance, which was an action recommended in the Council's Air Quality Action Plan. Air Quality considerations were certainly relevant to the assessment of Development Options, both in terms of on-site impact and impact on the wider area and the AQMA. We used an Air Quality criterion in our 'sustainability appraisal' of the sites. The accessibility of a site by sustainable modes of transport and its proximity to employment, education and services will play a large role in determining the impact of development in that location on air quality, as well as its impact on climate change. The Local Development Plan's policies and guidance on transport and access and the layout of allocated sites will therefore play a large role in addressing air quality issues.

Scottish Government –

Forestry and Woodland

Although there's no mention in the Main Issues Report of the existing Aberdeen City and Shire Forest and Woodland Strategy which is very good, we would hope it would be referenced in the Proposed Plan, and perhaps adopted as supplementary guidance and/or updated in due course.

Response: Most woodland planting and management is outside planning control, however woodlands are a key landscape feature in the city and are of huge recreational and biodiversity value. Although adoption as Supplementary Guidance is unlikely, reference could certainly be made to the strategy to inform the context of new development and promote linkages.



RSPB – Object that there are important subjects which are not included in the MIR. Such as:

- Protection of nature conservation sites
- Biodiversity
- Sustainable development
- Renewable Energy
- Climate change
- Flooding

Response: We used a sustainability checklist to assess the Development Options submitted to us, which included many of the above issues. A policy main issue was also presented on sustainable construction to examine how we could address the environmental impact of development. The Main Issues Report was also subject to a Strategic Environmental Assessment.

Bucksburn and Newhills Community Council - Agree that it is essential that Aberdeen has sufficient people, homes and jobs to support services and facilities needed to maintain and improve quality of life but there's also a need to protect and improve the built and natural environment and our cultural heritage.

Response: We welcome the support for the growth strategy and take on board the need for balance and support the importance communities place on both the built and the natural heritage of Aberdeen.

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