



**REPORT TO SCOTTISH MINISTERS ON THE PROPOSED ABERDEEN
CITY AND SHIRE STRATEGIC DEVELOPMENT PLAN**

STRATEGIC DEVELOPMENT PLAN EXAMINATION

carried out under Section 12 of the

Town and Country Planning (Scotland) Act 1997

Reporters: Scott Ferrie MSc MRTPI
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Date of Report: 21 January 2014



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Our ref: SDP-100-1

21 January 2014

Dear Mr McNairney

**PROPOSED ABERDEEN CITY AND SHIRE STRATEGIC DEVELOPMENT PLAN
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT PLANNING)
(SCOTLAND) REGULATIONS 2008
SUBMISSION OF THE REPORT OF THE EXAMINATION**

We refer to our appointment by the Scottish Ministers to conduct the examination of the above plan. Having satisfied ourselves that the authority's consultation and engagement exercises conformed with their participation statement, our examination of the plan commenced on 22 August 2013. We have completed the examination, and now submit our report, enclosing one electronic copy and one bound.

In our examination we considered all 17 issues arising from unresolved representations which were identified by the authority. In each case we have taken account of the summaries of the representations and the responses, as prepared by the authority, and the original representations, and we have set out our conclusions and recommendations in relation to each issue in our report.

We did not require to hold any hearing or inquiry sessions, but requested additional information about a number of matters.

We have recommended that modifications should be made to the plan arising from 12 of the 17 issues.

It is now for Scottish Ministers to consider the report and decide whether or not to approve the plan, with our without modifications.

A letter will be issued to all those who submitted representations to inform them that the examination has been completed and that the report has been submitted to Scottish Ministers. It will advise them that the report is now published and available to view at the DPEA web site at:

<http://www.dpea.scotland.gov.uk/>

and can be inspected at the Aberdeen City Council Headquarters, Aberdeenshire Council Headquarters, Banff and Buchan Area Office, Buchan Area Office, Formartine Area Office, Garioch Area Office, Kincardine and Mearns Area Office and Marr Area Office, and posted on the authority's website at:

<http://www.aberdeencityandshire-sdpa.gov.uk>

It would be helpful to know in due course whether or not Ministers approve the plan as submitted or if any modifications are proposed.

Yours sincerely

Scott Ferrie
Reporter

Stephen Hall
Reporter

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Examination of Conformity with the Participation Statement

1. Section 12(2) of the Town and Country Planning (Scotland) Act 1997 (as amended) states that a person appointed to examine a proposed strategic development plan “is firstly to examine ... the extent to which the strategic development planning authority’s actions with regard to consultation and the involvement with the public at large as respects the proposed plan have conformed with (or have been beyond the requirements of) the participation statement of the authority which was current when the proposed plan was published under section 10(1)(a).” Paragraph 73 of Planning Circular 1/2009:

Development Planning indicates that in this assessment the appointed person is only expected to refer to existing published documents such as the participation statement, the report on conformity and any representations relating to the authority’s consultation and public involvement activities.

2. The proposed Aberdeen City and Shire Strategic Development Plan was published in February 2013. The development plan scheme current at that time was published in March 2012.

3. The participation statement is included at pages 4 and 5 of the development plan scheme. In that section are included the measures the authority proposed to take to involve councillors, community councils, key agencies and other stakeholders, including the general public, at the various stages of plan preparation. The participation statement includes measures already taken at the main issues report stage, but our examination is limited to a consideration of conformity with what was proposed for the proposed plan stage. The participation statement sets out both a number of particular actions that the authority would carry out at this stage, and some more general actions applying to the plan preparation period as a whole. These included:

- a) speaking to relevant groups about particular issues when preparing the proposed plan;
- b) sending copies to all contacts;
- c) using press notices and press releases to reach the wider public;
- d) asking for comments by post, email or on the website;
- e) telling everyone registered on the database about submission to Scottish Ministers, and advertising this in the newspapers;
- f) publishing all the information about responses to representations and submission to Scottish Ministers on the website;
- g) keeping people up-to-date about what the authority was doing and all opportunities to get involved;
- h) keeping a database of contacts up-to-date for key agencies, councillors and community councils;
- i) letting all people with an interest know about important stages of the process, including sending an email to everyone who registers their email address on the website;
- j) sending all press releases to every local newspaper (as well as some national media organisations) and putting them on the website;

- k) preparing the plan in a clear and open way, including making all relevant information available on the website, and monitoring progress;
- l) trying to make documents as easy to understand as possible, including checking the information produced is at the right level for the audience; and
- m) carrying out an equalities and human rights impact assessment of the proposed plan; making every effort to make sure that event venues are accessible to all and providing documents in other formats or languages if needed; and providing an audio version of the proposed plan.

4. The report on conformity with the participation statement was published in July 2013, and submitted to Ministers along with the proposed plan. It sets out in tabular form the manner in which the strategic development planning authority's actions in regard to the participation conformed with, or went beyond the requirements of, the proposals (listed above) contained in the development plan scheme. We are not aware that the authority's consultation or public involvement activities have been raised in any representations on the proposed plan.

5. Having considered the report on conformity, we sought clarification on a number of points from the authority. The authority's response provided us with assurances that all the actions proposed in the participation statement had been carried out, or equivalent actions achieving the same outcome had been carried out. On this basis we found that the authority had consulted on the plan and involved the public in the way it said it would in its participation statement, in accordance with section 12(2) of the Act. Being satisfied, we therefore proceeded to examine the proposed strategic development plan.

Issue 1	Introduction	
Development plan reference:	Chapter 1 (Pages 2-5)	Reporter: Scott Ferrie
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> Nestrans (PP051a) SSE Generation Ltd (PP216a) SHE Transmission plc (PP217a)</p> <p><u>Coverage of the plan</u> Banff & Macduff Community Council (PP082)</p> <p><u>Maps on page 3</u> Banff & Macduff Community Council (PP083)</p> <p><u>Influences on the plan</u> SportScotland (PP011) Stewart Milne Homes (PP111) Scottish Retail Properties Ltd Partnership (PP166a) Fred Olsen Renewables Ltd (PP206b)</p> <p><u>National Planning Framework 2 and 3</u> Aberdeen International Airport (PP125a) Barratt East Scotland/Drum Development Co (Stonehaven) Ltd (PP192d) Aberdeen Harbour Board (PP208) SSE Generation Ltd (PP216b)</p>		
Provision of the development plan to which the issue relates:	Introduction	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p>PP051a – Recognition of the Regional Transport Strategy as an important influence on the SDP (para 1.17 and image) is welcome, with the two strategies being complementary. The refresh of the Regional Transport Strategy will strengthen these links.</p> <p>PP216a, PP217a – Generally, the proposed SDP appears to be a visionary, strategic and forward looking and to set an appropriate framework for the encouragement of investment over the plan period.</p> <p><u>Coverage of the plan</u></p> <p>PP082 – The title of the plan is a misnomer as it only deals with issues that the Aberdeen City has an involvement in, leaving communities such as Banff and Macduff outside of the plan even though shown on the maps.</p>		

Maps on page 3

PP083 – The right hand map on p3 is misleading and incomplete and should show offshore wind areas of search.

Influences on the plan

PP011 – It would be useful for the SDP to provide some context and direction on marine planning and the implications of the Marine (Scotland) Act.

PP111 - The claim that the plan has had regard to a number of international, national and regional influences in its preparation is rhetoric. The success of the energy sector and resultant population growth has not been taken account of.

PP166a – The plan’s introduction makes no reference to the current challenging economic conditions which are forecast to continue. In difficult trading conditions it is even more important to town and city centres for retail development.

PP206b – The '2020 Routemap for Renewable Energy in Scotland' (2011) should given specific mention as an influence on the plan.

National Planning Framework 2 and 3

PP125a – Preference for paragraph 1.14 referring to ‘future development of’ rather than ‘improvements to’ the airport. The text currently implies minor changes from outside rather than expansion and growth from within.

PP192d, PP208 – Para 1.13 and the right hand map on p3 should be updated to reflect NPF3.

PP216b – Paragraph 1.14 (and Schedule 2) refer to proposed works at Peterhead Power Station. The power station itself will not be ‘upgraded’ but instead will be subject to the addition of a carbon capture and storage system.

Modifications sought by those submitting representations:

Support

PP051a, PP216a, PP217a – None sought (supportive)

Coverage of the plan

PP082 – replace second sentence of para 1.7 with...“It does not cover all planning issues but only those which are nationally or regionally important within either Aberdeen City or Aberdeenshire or can best be dealt with by Aberdeen City Council and Aberdeenshire Council working together.”

Maps on page 3

PP083 – Update the NPF2 map on p3 to reflect the latest Marine Scotland offshore wind areas of search.

Influences on the plan

PP011 – For the SDP to provide strategic direction and context on marine planning and its policy implications.

PP111- The plan needs to be reviewed in advance of adoption to take into account the most up to date influences, such as economic development reports and 2010 population and household projections.

PP166a – Make reference to challenging economic conditions and the need to respond by supporting development.

PP206b – The '2020 Routemap for Renewable Energy in Scotland' (2011) should be given specific mention on page 4 as it is a significant Scottish Government strategic document.

National Planning Framework 2 and 3

PP125a – We would prefer that para 1.14 mentioned 'future development of' rather than 'improvements to' the airport.

PP192d, PP208 - Para 1.13 and the right hand map on p3 should be updated to reflect NPF3.

PP216b – Paragraph 1.14 and Schedule 2 should be amended to refer to 'modification' rather than 'upgrading' at the power station.

Summary of responses (including reasons) by planning authority:

Support - PP051a, PP216a, PP217a – Support welcomed.

Coverage of the plan

PP082 - The plan covers the areas of both Aberdeen City and Aberdeenshire (excluding the Cairngorms National Park), as indicated in para 1.6 and maps or diagrams throughout the plan. However, the plan has a particular focus to establish a common approach to matters extending beyond an individual council area, as set out in CC/Doc 16 Scottish Government Circular 2/2008 (paras 4 & 6). The text in the second sentence of para 1.7 correctly describes the coverage of the plan.

Maps on page 3

PP083 – The map on p3 is the strategy map from NPF2 (albeit that the colours have been changed for fit in with the proposed SDP's own design. It would cease to be the strategy map from NPF2 if additions were made to it. Marine Scotland has yet to publish a final plan, with only draft guidance available at the current time. In any event, the SDP only covers land use out to the mean low water mark at spring tides. Para 1.15 notes the evolving marine planning landscape.

Influences on the plan

PP011, PP111, PP166a, PP206b – The plan identifies the emerging work on marine

planning at the national and regional level (para 1.15). The SDPA have been actively involved in responding to Marine Scotland consultations on the National Marine Plan and Regional Marine Planning boundaries. However, there is a statutory requirement for the respective plans to take each other into account (Regulation 5 of the Town and Country Planning (Miscellaneous Amendments) (Scotland) Regulations 2011 and Schedule 1 (s3) of the Marine (Scotland) Act 2010). This will require engagement between the SDPA and Marine Scotland and the respective Regional Marine Planning Partnerships. It is anticipated that the next SDP will have more to say on the issues which cross the marine/terrestrial boundary. However, a range of proposals identified within the plan already have clear linkages to marine planning, including carbon capture and storage, offshore electricity transmission and developments at Aberdeen and Peterhead harbours. While the economic challenges faced by the country are recognised (including within the first paragraph of the plan - para 1.1), the plan is also positive about the local economy and its ability to drive forward Scotland's economic recovery. It is recognised that Aberdeen City and Shire is currently in a favourable economic position relative to the rest of Scotland and the UK as highlighted in the Monitoring Statement (CCDoc5h) and numerous reports to the SDPA over the last 3 – 4 years. It is the very reason why the SDP continue with the ambitious strategy for growth set out in the current Structure Plan. There would be no value in starting the plan process again as suggested in one representation. The development industry needs to focus on implementing the plan and its substantial allowances.

There is no need to specifically mention the '2020 Routemap for Renewable Energy in Scotland' (2011) in the SDP. The document is a 'second tier' document which sits within the context of the more strategic documents already referenced. A whole range of routemaps and action plans could be identified and it would be inappropriate to single out this one.

National Planning Framework 2 and 3

PP125a, PP192d, PP208, PP216b – Paragraphs 1.13 and 1.14 distil the contents of National Planning Framework 2. NPF2 uses the term 'improvements' (CC/Doc12), pages 109/110) in relation to the airport national development, while 'upgrade' is an appropriate word to describe both the current national development (CC/Doc12, pages 122/123) and current proposals in relation to the power station. It would not be appropriate to change these references retrospectively.

The NPF3 Main Issues Report had still to be published at the close of representations on the proposed plan and NPF3 is not due to be published in its final form until mid-2014 (SupSDP/Doc1: NPF3 Participation Statement). It is therefore not possible to make the changes suggested at this time. It will be for Scottish Ministers to take these issues into account when they approve the plan.

The Strategic Development Planning Authority has been actively engaged with the Scottish Government in the preparation of NPF3 and making the case for the area in terms of infrastructure priorities and development opportunities. This is not something you would expect to see within the SDP itself.

There is no need to make any amendments to the proposed plan arising from these representations.

Reporter's conclusions:Coverage of the plan

1. There is no doubt whatever that the proposed plan covers the administrative areas of both Aberdeen City and Aberdeenshire, excluding that part of Aberdeenshire located within the Cairngorms National Park. That is as required by Circular 1/2013: Strategic Development Plan Areas and is made clear at paragraph 1.6 and in various maps throughout the plan. I am satisfied that paragraph 1.7 appropriately sets out the relationship between the proposed plan and local development plans, which will cover a wider range of more detailed issues. Subsequent local development plans, including the one covering Banff and Macduff, will of course require to be consistent with the principles set out in this plan.

Maps on page 3

2. The right-hand map on page 3 is clearly labelled as the NPF2 strategy map. To make ad-hoc alterations to it would be inappropriate. I do, however, accept the point that strategic areas of marine energy potential are likely to have onshore implications which ought to be considered in development plans. The authority advises that the current Marine Scotland proposals are not yet in finalised form. In that context, I am satisfied that paragraph 1.15 appropriately references ongoing work on marine planning at the national and regional level. Subsequent development plans will require to take account of that work once it is finalised.

Influences on the plan

3. As referred to above, I consider that paragraph 1.15 of the proposed plan appropriately references ongoing work on marine planning. The plan also includes a range of proposals with clear linkages to marine planning. I consider that it would be premature for the plan to consider the terrestrial impacts of marine development in more detail at this relatively early stage in the marine planning process. As the authority says, there is a statutory duty that the respective marine and development plans take each other into account. In that regard, the next iteration of the strategic development plan will require to consider more specifically the onshore implications of matters contained in the National Marine Plan. As that is a statutory duty however, there is no need to re-state it in the plan.

4. Paragraph 1.11 states that the proposed plan has a range of international, national and regional influences in mind, as well as the character of the area. I accept to some extent that this is rhetorical, but am satisfied nonetheless that there is evidence throughout the plan and related documents that such influences have been properly taken into account. I consider the level of ambition demonstrated in the plan in more detail under Issue 5: Scale of growth.

5. Overall, I am satisfied that the strategic-level challenges and opportunities facing the plan area are adequately outlined at this introductory part of the plan, and that these are subsequently considered in more detail in the appropriate parts of the plan.

6. A range of Scottish Government legislation and strategies are set out at paragraph 1.15. Whilst I accept that this list cannot be exhaustive, especially in the context of an introductory chapter, I do not agree with the authority that the 2020

Routemap for Renewable Energy in Scotland (2011) sits at a lower tier than some other of the publications mentioned. As the Routemap has significant implications for the area covered by the plan, I consider it appropriate that it be referred to in paragraph 1.15.

National Planning Framework 2 and 3

7. The last sentence of paragraph 1.14 relates to the 3 ‘national developments’ listed in NPF2 which are within the plan area. Whether the proposed works at Aberdeen Airport are referred to as ‘improvements’ or ‘future development’ would have no bearing on any subsequent assessment of the acceptability of those works. The same applies to references to Peterhead Power Station. It is entirely appropriate however, that reference to those developments in the plan remain consistent with NPF2.

8. Comments on the Main Issues Report for NPF3 are currently being analysed and it is intended that the proposed NPF3 shall be published in June 2014. That would in turn be subject to parliamentary scrutiny. Those matters set out in the Main Issues Report may therefore, be subject to significant change. In that context I am in no doubt that any substitution of references (including the plan on page 3) to NPF2, with reference made instead to NPF3, would be premature.

9. I note the contention that the proposed plan ought to make the case for a greater share of ‘national developments’ to be included in NPF3. The authority responds that it has actively engaged with the Scottish Government in that regard. It would be inappropriate for the plan to be used as a lobbying vehicle; rather it is required to set out a vision for the plan area having regard to the NPF in force at the time.

Reporter’s recommendations:

I recommend that the following modification be made:

1. At paragraph 1.15, insert “, 2020 Routemap for Renewable Energy in Scotland” between “Regeneration Strategy” and “and the Agenda for Cities”.

Issue 2	Vision	
Development plan reference:	Chapter 2 (Page 6)	Reporter: Scott Ferrie
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> SportScotland (PP015) Sigma Capital Group Ltd (PP022) Nestrans (PP051b) Grandhome Trust (PP109a) Scotia Homes Ltd (PP132) Scottish Retail Properties Ltd Partnership (PP166b) John Lewis plc (PP169) Aberdeen Science Parks LP (PP197a) Drum Property Group Ltd (PP200a) Fred Olsen Renewables Ltd (PP206a) The Greenspan Agency (PP207a) Aberdeen Cycle Forum (PP214a) Aberdeen & Grampian Chamber of Commerce (PP226a, PP226c)</p> <p><u>General</u> Scottish Natural Heritage (PP063) Aberdeen Harbour Board (PP209) Homes for Scotland (PP234) Bancon Developments Ltd (PP240)</p> <p><u>Vision</u> Sandlaw Farming Ltd (PP035) George Ingram (PP050) Dunecht Estates (PP149) Stewart Milne Homes (PP116) NHS Grampian (PP213k) Scottish Retail Properties Ltd Partnership (PP166b)</p> <p><u>Aims</u> NHS Grampian (PP213b) North Kincardine Rural Community Council (PP224a)</p> <p><u>Policy</u> Scottish Natural Heritage (PP053)</p>		
Provision of the development plan to which the issue relates:	Vision	
Planning authority's summary of the representation(s):		
<p><u>Support</u> PP015 – Support for the vision as it specifically addresses the environment and quality of life which are important for sport and recreation.</p>		

PP051b – Nestrans support the main aims of the plan, along with the fourth supporting aim ('making the most efficient use of the transport network...'). These are appropriate and consistent with the Regional Transport Strategy.

PP132, PP169, PP197a – Support for the overall vision for the plan. Support for the main aim of the plan to provide a framework for investment decisions which help grow the regional economy

PP207a – Support for the two main aims of the plan as according with the requirement to prepare development plans with the aim of contributing to sustainable development.

PP206a - We applaud the Council for having as one of its two main aims taking on the urgent challenges of sustainable development and climate change.

PP022, PP109a – Support for the broad vision and aims of the plan in terms of growing and diversifying the local economy through sustainable patterns of development, and the strong recognition of the benefits of sustainable mixed communities.

PP200a – We support the vision and aims of the plan.

PP214a – Welcome the commitments to cycling in the plan's vision and aims, particularly the aim to make sure "walking, cycling and public transport are attractive choices". Encouraged by the commitment to all of the aims to achieve the vision.

PP226a – The aims of the plan and introductory statements are encouraging. Broadly support the vision and aims of the plan.

General

PP063 – No reference to 'sustainable' economic growth in objective 1. This omission is at odds with the overall aims and vision of the plan (CC/Doc1) and at odds with Scottish Planning Policy.

PP209 – Lack of reference to 'sustainable economic growth'.

PP234, PP240 – The plan has a sound vision and admirable aims and objectives but the plan as a whole fails to deliver them in terms of opportunities for housing and business expansion.

Vision

PP035, PP149 and PP213k – It is not appropriate to just carry the vision forward from the approved Structure Plan, simply moving the vision back 5 years means that it is somewhat diluted. That was the vision to 2030, the plan must set a new vision for 2035. There must also be clear targets set against progress so the vision can be measured.

PP050 - Do not disagree with the plan's vision. However, question what has been excluded.

PP166b – Broadly support the plan's vision but would suggest an additional bullet point: "We will be recognised for...our thriving, attractive and dynamic city centre".

Aims

PP213b – This chapter fails to acknowledge the importance of protecting and promoting the health and wellbeing of the communities of Aberdeen City and Aberdeenshire, either at present or in the future.

PP224a – The first supporting aim is confusing. Services and facilities will surely grow or improve alongside, or following, the building of houses and the potential increase in population. The Aim as stated implies that they should be provided first; a dangerous cart-before-the-horse policy.

Policy

PP053 – More clarity is required in the wording of the policy. It should be stated more explicitly that all aims are of equal importance.

Modifications sought by those submitting representations:

Support

PP015, PP022, PP051b, PP109a, PP132, PP166b, PP169, PP197a, PP200a, PP206a, PP207a, PP214a, PP226a – None sought (supportive).

General

PP063 – Change the overall heading of objective 1 from ‘Economic Growth’ to ‘Sustainable Economic Growth’. Paraphrase references to economic growth throughout chapter 4 to precede ‘economic growth’ with the word ‘sustainable’.

PP209 – The inclusion of references to ‘sustainable economic growth’ in the vision, aims and policy of the plan:

Vision – “...We will have acted confidently and taken the courageous decisions necessary to *achieving sustainable economic growth* by further *developing* a robust and resilient economy and to *leading* the way towards development being sustainable, including dealing with climate change and creating a more inclusive society.”

Aims – “*The overriding purpose of the plan is sustainable economic growth. In doing so the plan aims to:*”

Policy - In assessing development proposals, we will balance the importance given to each aim in coming to a decision, taking into account the spatial strategy, objectives and targets of the plan *with an overarching aim of achieving sustainable economic growth.*

PP234, PP240 – None suggested in these representations.

Vision

PP035, PP149, PP213k – The vision should set a clear target date by which it should be achieved. Progress towards each of the objectives set out in the Plan must be measured and the plan should be clear on how that progress will be measured.

PP050 – None suggested.

PP166b – Suggest an additional bullet point: “We will be recognised for...our thriving, attractive and dynamic city centre”.

Aims

PP213b – A further aim should be added to the plan which addresses the health and wellbeing of the communities within the region. This should also more readily address the issue of close partnership working between public agencies and the private sector to deliver the vision.

PP224a – None suggested.

Policy

PP053 – Amend the policy to read: *“In assessing development proposals, we will attach equal importance to each aim in coming to a decision. Developments should seek to contribute to the achievement of all the aims in an integrated way. Development proposals should also accord with the spatial strategy, objectives and targets of the plan”.*

Summary of responses (including reasons) by planning authority:

Support

PP015, PP022, PP051b, PP109a, PP132, PP166b, PP169, PP197a, PP200a, PP206a, PP207a, PP214a, PP226a – Support welcomed.

General

PP063, PP209, PP234, PP240 – The proposed SDP was prepared in the context of Scottish Planning Policy (2010) and National Planning Framework 2 (2009) and does not need to replicate the terminology of these documents to be consistent with them. It would not be appropriate to impose the use of a particular phrase (sustainable economic growth) on the document in the way suggested. The proposed SDP has been written in plain English and as a consequence, if the phrase were to be used, a plain English definition would be required in the glossary. Any definition would need to be very different from Scottish Planning Policy para 36 (CC/Doc11) and would expose the different interpretations of the phrase that exist.

The plan delivers the vision, aims and objectives through (among other things) significant allowances for housing and employment, well beyond anything delivered in the area over the last 20 years. The detail of these matters is set out under separate issues.

The Scottish Government has made no representations to the plan and must therefore be content with the plan and that it is consistent with Scottish Government policy.

Vision

PP035, PP050, PP149, PP166b, PP213k – The Main Issues Report (CC/Doc3) was accompanied by a Monitoring Statement (CC/Doc5h) and highlighted that many of the key issues facing Aberdeen City and Shire have not significantly changed since the

Structure Plan was approved by Scottish Ministers in 2009. Given this fact, it is not appropriate to change the overall vision of the plan. The vision is very high level and is still relevant to how the region should develop. It would not be appropriate to single out particular issues for inclusion in the vision such as the city centre, these are adequately addressed elsewhere in the plan (such as paras 3.21 and 4.2). While the structure plan vision included an end-date of 2030, no end-date is now shown in the proposed plan because the vision transcends an end-date.

Each chapter of the plan puts forward targets and identifies how these will be monitored. The need to monitor the plan is set out in paragraphs 5.13 - 5.15. Progress against the vision of the plan will be assessed using these indicators. The Proposed Plan is accompanied by an Action Programme (CC/Doc4a) which provides a framework outlining the specific actions which must be undertaken to facilitate the implementation of the plan. Actions 119 and 120 outline that as well as preparing a Monitoring Statement, the SDPA will also prepare a Monitoring Report which will present up-to-date information and will measure how the SDP is performing. The plan preparation process is iterative and while the plan covers the period up to 2035, this is by no means an end-date. Under legislation the SDP is required to be reviewed and updated every 5 years (para 5.16), within which time any significant changes within either the region or national priorities can be reflected in the plan. Without further information it is not clear what has been excluded from the vision.

Aims

PP213b, PP224a – No timescale is suggested in the first supporting aim in relation to service provision and development, it merely makes it clear that there is a relationship between improving the quality of life of the area, service provision and population, household and economic growth at a range of spatial scales. At the regional scale, for example, population growth supports higher-level services and facilities in the area which are not necessarily directly related to the development itself (such as increasing the potential support for services provided by the airport, theatre and hospitals). Population decline and job losses in an area can have a negative impact on the level of services and facilities available within communities.

Health and wellbeing are over-arching themes which are already reflected in the vision of the plan (for example, an attractive, prosperous, sustainable place, an excellent place to live, recognised for its high quality of life). Sustainable mixed communities and active travel are also aims which relate to these themes. There is no need for a further aim which would take away from this holistic perspective.

There are numerous references throughout the plan to the need for public, private and voluntary sectors to work together to deliver the plan and its vision (for example, paragraphs 1.4, 3.46, 4.4 and 5.2). There is no need to mention this issue elsewhere in the plan.

Policy

PP053 – Paragraph 1.9 of the plan highlights the fact that the plan needs to be read as a whole, while paragraph 2.3 stresses the commitment to all the aims, with the need for an integrated approach to the delivery of the vision. However, the aims do not have equal weight, not least because two of the aims are identified as ‘main aims’. The weight accorded to each aim will vary over time and across the area but all are important and

need to be taken into account in the decision-making process. Balancing often conflicting interests in different situations is a large part of the planning process.

There is no need to make any amendments to the proposed plan arising from these representations.

Reporter's conclusions:

General

1. Scottish Planning Policy states the Scottish Government's overarching purpose to be increasing sustainable economic growth, and that the planning system ought to be directed towards that purpose. Paragraph 36 of Scottish Planning Policy defines sustainable economic growth as "building a dynamic and growing economy that will provide prosperity and opportunities for all, while respecting the limits of our environment in order to ensure that future generations can enjoy a better quality of life too".

2. On the face of it, the omission of any reference in the proposed plan to that overarching purpose appears discordant. I note the authority's reliance on the lack of any representation from the Scottish Government on this matter, but it is not my understanding that it would provide a detailed line by line critique at proposed plan stage. I also do not accept the authority's comments regarding the definition of sustainable economic growth set out in Scottish Planning Policy and repeated above.

3. The proposed plan must however, be tailored to address the specific characteristics of the plan area. In that regard it seems to me that an assessment of whether and how the plan contributes towards the overarching purpose of sustainable economic growth is what matters most. I am satisfied overall that the vision for the plan set out at Chapter 2 appropriately responds to that overarching purpose. However, I consider that the lack of any reference whatever to that overarching purpose is inadequate.

4. I deal with the representation regarding references to sustainable economic growth in Objective 1 and Chapter 4 under Issue 3.

5. I note those other representations which are supportive of the vision set out in Chapter 2, but which consider that this is not adequately followed through in those parts of the plan dealing with housing and business growth. Those matters are addressed more specifically under Issues 3 and 5.

Vision

6. I note that, other than the deletion of a 2030 target date, the vision of the approved structure plan has been rolled forward into the proposed strategic development plan. I have no evidence that circumstances have changed to any degree that would justify modification of the Vision. I take some limited support, in reaching this finding, from paragraph 68 of Circular 6/2013: Development Planning which states, in relation to main issues reports, that: "Content that the authority proposes to retain in the Proposed Plan from the existing plan...should be identified in the MIR but with limited discussion."

7. I agree with the authority that it would be inappropriate to single out particular issues, such as the city centre, for inclusion in the vision, and that the nature of the Vision transcends a fixed end-date. To guard against drift and allow for the measurement of

progress however, there are various targets with end-dates throughout the plan where appropriate. Paragraphs 5.13-15 set out how the plan is to be monitored.

Aims

8. The aims of the approved structure plan have been rolled forward without modification into the proposed plan. I am satisfied that my finding in regard to the Vision, expressed at paragraph 6 above, applies here also.

9. Notwithstanding that, I agree with the authority that health and wellbeing are overarching themes which need not be the subject of a further aim. Partnership working is also referred to throughout the proposed plan and in the Action Programme. Additional reference to that here would, to my mind, tend to dilute the focus of this section of the plan.

10. I accept the authority’s reasoning, in regard to the first supporting aim, that a sufficient population base (together with the homes and jobs that that entails) is required to support services and facilities at a level appropriate to improve the quality of life. There are obvious risks of population decline and an associated reduction in services in the plan area’s more remote parts. I see no need to modify this supporting aim.

11. Scottish Enterprise, in representation PP188 considered under Issue 13, welcomes the plan’s Vision, and in particular its reference to the knowledge economy and high value markets. It goes on to suggest though, that an additional aim be included at page 6, expressing how the plan will grow high value markets. However, no wording for such an aim is suggested, and in any event I am not convinced that any such detailed aim would be appropriate in this section of the plan.

Policy

12. The policy at the end of chapter 2 is also rolled forward from the approved structure plan. No evidence has been provided that circumstances have changed which would justify amending the policy. I am in any event satisfied that paragraph 2.3 clearly sets out the plan’s commitment to each of the aims. I agree with the authority that decision making necessarily entails a balancing of considerations. The amendment to the policy sought here would unreasonably constrain that process.

Reporter’s recommendations:

I recommend that the following modification be made:

1. Amend the first sentence of paragraph 2.2 to read:

“To make this vision a reality, and to contribute towards the overarching Scottish Government purpose of increasing sustainable economic growth, we have developed a series of aims.”

Issue 3	Economic Growth	
Development plan reference:	Chapter 4 (Pages 24 - 26)	Reporter: Scott Ferrie
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> Union Square Developments Ltd (PP128) Scotia Homes (PP134) Scottish Retail Properties Ltd Partnership (PP166f) John Lewis plc (PP170, PP173, PP174, PP175) Aberdeen Science Parks LP (PP198a)</p> <p><u>Retail</u> Esson Properties Ltd (PP102) Scottish Retail Properties Ltd Partnership (PP166e) John Lewis plc (PP172) Drum Property Group Ltd (PP201)</p> <p><u>Scale of Employment Land Allocations</u> Westhill Developments (Arnhall) Ltd (PP047a) Stewart Milne Homes (PP115) Homes for Scotland (PP141) Bancon Developments Ltd (PP243) Aberdeen & Grampian Chamber of Commerce (PP248)</p> <p><u>Employment Land – Strategic Reserve - CALA Homes East Scotland/SRUC (PP002)</u></p> <p><u>Sector and site recognition</u> ASDA Stores Ltd (PP019) D Fairlie Partnership (PP159) Aberdeen Science Parks LP (PP198b) Fred Olsen Renewables Ltd (PP206d) Aberdeen Harbour Board (PP211) NHS Grampian (PP213d)</p> <p><u>Recognition of Natura 2000 sites in site selection - Scottish Natural Heritage (PP064)</u></p> <p><u>High-speed Broadband - Old Aberdeen Community Council (PP219)</u></p>		
Provision of the development plan to which the issue relates:	Chapter 4, Objective 1, Economic Growth	
Planning authority’s summary of the representation(s):		
<p><u>Support</u></p> <p>PP128 – Supportive of the identification of a strong service centre as an important contributor to economic growth. The continued adoption of a sequential approach to the</p>		

location of retail and commercial leisure developments will be important in ensuring further appropriate investment in the vitality and viability of the city centre.

PP134a – Support for the objective and generous supply of employment land provided as part of sustainable mixed use neighbourhoods.

PP166f – Agree with the third sentence of para 4.2 (in relation to supporting the regeneration of Aberdeen city centre) and that the retail target should be updated.

PP170, PP173, PP174 and PP175 – Support for the roll out of high speed broadband; commitments to the improve ports and airports and the commitment to secure Aberdeen’s position within the top 20 retail destinations is also supported.

PP198a – Support for the targets in the plan for at least 60ha of marketable land be available to businesses at all times in a range of places within Aberdeen City, and for at least 20ha of this land to be available to businesses in the strategic growth areas which will attract high quality businesses or be suitable for company headquarters.

Retail

PP102 – The SDP should provide more specific guidance on retail provision to assist the LDP’s in preparing policies. Does figure 6 (page 26) include provision for additional retail or is this to be included in housing land allocations? There needs to be more specific guidance on retail capacity, specifically within the strategic growth areas. Is the target for Aberdeen to remain in the top 20 retail areas in the UK referring only to the city and does this only include existing retail centres or are new areas to be brought forward?

PP166e – Two paragraphs (3.21 and 4.2) would appear too little in view of retail’s strategic importance. Support for the sequential approach outlined in para 4.2 but it does not go far enough. It is essential that the approach to retail in the current structure plan and the SDP Main Issues Report is retained. The SDP should define a hierarchy of centres as required by SPP, with Aberdeen city centre taking primary place.

PP172 – More clarity should be provided in relation to the sequential retail approach in para 4.2 of the plan (CC/Doc1).

PP201 – The SDP should recognise the polycentric nature of Aberdeen and its hinterland and allow for a balance between supporting existing retail centres and providing convenience retail in existing and new communities where the need to travel is reduced.

Scale of Employment Land Allocations

PP047a – Given current and anticipated economic activity it is prudent to plan for growth and ensure that sufficient land is available to satisfy market demand.

PP115 – The SDP is not ambitious enough, does not provide sufficient confidence enough to encourage inward investment and requires a more generous supply of marketable employment land.

PP141 – The plan fails to recognise that a faster level of population growth inevitably means that business also requires a more generous supply of land to be made available.
PP243 – The targets for economic growth are too low and do not reflect the dynamic of

the local economy or the reports which predict continued high employment for many years.

PP248 – The plan is too conservative with regards to business land requirements. The allocations only expect current levels of growth to continue but this is vastly insufficient.

Employment Land – Strategic Reserve

PP002 – Concerns over allocation of 70 hectares of Strategic Reserve Land within Aberdeen City 2027 – 2035 (CC/Doc 1, Figure 6, pp26) and the restricting impact this will have on other uses for the land. Particular concern relating to what impact this long term speculative allocation will have on Local Plan Site OP26, Craibstone North and Walton Farm.

Sector and site recognition

PP019 – Recognition of the importance of the service sector is welcome. However, it would be beneficial if the SDP went further in emphasising how each council should do this.

PP159 – The allocation and development of single use zoned commercial and employment areas does little for sustainable development.

PP198b – It is unclear the exact locations for the proposed development of land for business / industry and the plan should be clearer on this. The Aberdeen Energy and Innovation Parks are not mentioned as part of the Strategic Growth Area from Aberdeen to Peterhead and further clarification should be provided. The Parks should be identified on p26 of the plan as land that can accommodate growth.

PP206d – Renewable energy should be seen as a significant strength to a healthy economy and integrated into economic growth plans.

PP211 – Omission of the maintenance of growth of the oil, gas and renewables industries from the economic growth targets.

PP213d - Recognition of the inclusion on page 26 of the plan (CC/Doc1) of the Foresterhill Masterplan (prepared by Aberdeen University and NHS Grampian). However, greater recognition should be made elsewhere in the text to the contribution of NHS Grampian to the economy of the North East. NHS Grampian is the largest employer within Aberdeen City and Aberdeenshire and Foresterhill Masterplan provides significant opportunities for high quality health services and excellence in education and research.

Recognition of Natura 2000 sites in site selection

PP064 –European designated sites fall within the Strategic Growth Areas. SNH recognise that the SGA's are only indicative and that the Natura 2000 sites which do fall within the SGA's have been identified in the Draft HRA and will be considered further in terms of mitigation through the preparation of the next LDP's. However, SNH feel that there is need, within the plan, to consider strategic mitigation to demonstrate that later plans or projects which could have adverse effects on the integrity of any European sites would not be supported by the plan.

High-speed Broadband

PP219 – The plan should focus on delivering maximum broadband coverage throughout Aberdeenshire as its absence will have a direct negative impact on the desirability of living in rural Aberdeenshire.

Modifications sought by those submitting representations:

Support

PP128, PP134, PP166f, PP170, PP173, PP174 & PP175, PP198a – None sought (supportive).

Retail

PP102 – More guidance is required from the SDP to inform retail policy at LDP level. Clarity is required as to whether retail is reflected in the business land allocations (Figure 6).

PP166e – Define the hierarchy of centres. The SDP should state that “Aberdeen city centre is the priority location for new retail development in the city region” and that “new retail proposals outwith defined centres should be assessed against the hierarchy and should consider cumulative impact as an important part of their assessment, taking particular attention in respect of the regional centre, Aberdeen city centre”.

PP172 – New final sentence at the end of para 4.2: *“Aberdeen City Council should be considered as the key retail location in the hierarchy of centres for that approach”*.

PP201 – The SDP need not identify locations for new convenience retail but could include a criteria-based policy or strategy to support it where it is easily accessible by various modes of transport and close to existing or proposed communities which are under-provided for. Local Development Plans should identify the specific boundaries for each retail and commercial centre.

Scale of Employment Land Allocations

PP047a, PP115, PP141, PP243, PP248e – The allowable area of business land should be increased.

Increase employment land allocations and increase the requirement for marketable employment land in SGA's from 60 Ha to 80 Ha at all times. Revise text to be more positive and increase employment land allocations.

Employment Land – Strategic Reserve

PP002 – That the SDP gives guidance to the next Local Development Plan for Aberdeen City so that site OP26 can be brought forward and allocated as effective employment land before 2027. Recommendation that the need for a review of sites is added to the text and bullet points on page 26, especially in the context of bringing forward land to assist with the delivery of the Strategic Growth Areas.

Sector and site recognition

PP019 – The SDP could strongly emphasise the need for flexibility in responding to economic conditions, project viability and windfall opportunities. There needs to be a positive approach to development and the benefits it can bring.

PP159 – Include in the wording of the plan text that encourages employment allocations to be located in mixed use areas and a target to require at least one job space per dwelling in mixed use areas.

PP198b – There needs to be a clearer indication of where within the Strategic Growth Area economic growth should be directed and identify the Aberdeen Energy and Innovation Parks as land that can accommodate high quality business / industrial growth.

PP206d – Renewable energy should be added as a significant strength to a healthy economy (p24) and an additional bullet point be added to the targets on p25: 'Renewable energy development is integrated into economic growth plans for the area as much as is practical'.

PP211 – An additional target on page 25 'for the city region to retain its position as a centre of excellence for the marine energy sector'.

PP213d – Support for the recognition of the Foresterhill Masterplan. However, greater recognition within Chapter 4, objective 1 of the plan (CC/Doc1) of the economic contribution of NHS Grampian.

Recognition of Natura 2000 sites in site selection

PP064 – Additional paragraph after 4.5: *In allocating land for employment and new waste management facilities, local development plans should ensure that there would be no negative effect on any Natura 2000 site through impact on water quality or disturbance to species, at both construction and operational stages.*

High-speed Broadband

PP219 – Include a target "that greater than 99% of all domestic and business properties throughout Aberdeenshire should be able to access broadband at a download speed of at least 2Mb/s by 2020".

Summary of responses (including reasons) by planning authority:

Support

PP128, PP134, PP166f, PP170, PP173, PP174 and PP175, PP198a – Support welcomed

Retail

PP102, PP166e, PP172, PP201 – In line with the established sequential approach to retail, City / Town centres will be the main focus and the first point of call when identifying potential sites. While the city centre is the regional centre, it would not be appropriate to indicate that it is the priority location for new retail development. As the sequential approach to retail is defined in the glossary of the plan (CC/Doc1) on page 48, it is not felt

necessary to state this in paragraph 4.2, as it will not make any impact on how the sequential approach is carried out. The hierarchy of centres is defined in LDPs but the proposed SDP clearly identifies the city centre as the primary retail centre in the region. No substantive change has been made to the approach set out in the current structure plan.

The proposed plan (CC/Doc1) does not prescribe how much land should be allocated to new retail provision within the SDP area as this will be dependant on a number of factors. Given SDP's are designed to be concise and have strategic focus, a more prescriptive approach to retail provision would not be appropriate. Retail uses may be appropriate within mixed-use sites or on sites specifically allocated for retail in LDPs but the SDP does not require specific allocations for retail.

A retail study is being conducted on behalf Aberdeen City and Shire SDPA in partnership with Aberdeen City Council and Aberdeenshire Council. This will report in advance of the publication of Main Issues Reports for the two LDPs. A principle output of this will be to anticipate the potential impacts future housing allocations will have on the retail need and structure of the North East.

The plan provides guidance (to both LDP's) throughout different chapters, as to what the strategic approach with regard retail within the region is. The plan highlights that the promotion of retail throughout the region is to be a key consideration and that this should be done in line with SPP's (CC/Doc11) sequential approach, para 62. Objective 6 (*Sustainable Mixed Communities*) highlights the focus will not be in seeing different land uses in isolation and the emphasis will be in creating mixed communities (para 4.34). Para 4.38 highlights that within the strategic growth areas, services and facilities for the community (which will include a proportion of retail provision) must be a part of the development.

The reference to Aberdeen remaining in the top 20 retail areas in the UK is referring to the city and the city centre in particular. The monitoring statement (Doc v page 17) highlights a range of different retail rankings which are monitored, all having a slightly different focus and definitions.

Scale of Employment Land Allocations

PP047a, PP115, PP141, PP243, PP248 – The plan is positive about economic growth and seeks to facilitate this. The plan make provision for substantial areas of land for employment purposes throughout the area, well in excess of historic levels of development and any conceivable future levels of development. Particularly significant is the trend for new sites to be taken up by companies consolidating their existing operations onto one site which has the effect of releasing their current accommodation onto the market. The Employment Land Audit (SuppSDP/Doc34) shows an established supply of over 920Ha and a marketable supply of over 520Ha in 2012 (figures 3 and 4) before the additional 183Ha of strategic reserve land is taken into account (Proposed SDP figure 6). This is set against a maximum annual completion rate of 34Ha over the last 12 years and an average rate of just 17Ha (Appendix 6). At the maximum rate of completions over the last 12 years, the existing supply plus strategic reserve would last for almost 32 years, beyond the time horizon of the plan (at the average rate it would last for over 65 years). There is no strategic need for additional employment allocations on top of those identified in the plan. The minimum requirement at all times of 120Ha within the SGA's is appropriate given historic completion levels.

Employment Land – Strategic Reserve

PP002 – There is no strategic need for additional employment land in Aberdeen beyond that set out in figure 6 of the proposed plan. The Aberdeen Local Development Plan (2012) has currently started the process for review and will have the opportunity to consider the review of allocations over the next 2-3 years. There is no need to explicitly state this in the SDP. However, the SDP is a plan for the period to 2035 and beyond, and in the interests of planning for sustainable mixed communities, it is vital that account is taken of both residential and employment land requirements over this timeframe. To go back to short-term planning which has caused significant problems in the past would not be appropriate.

Sector and site recognition

PP019, PP159, PP198b, PP206d, PP211, PP213d – The SDP is positive about economic growth in general and the economic benefits it can bring. The main role of the plan is to set the context for this rather than get down to the detail of implementation. The plan seeks to provide the opportunities for growth in a way that respects the environmental and social issues the area faces. While national economic conditions do have an impact in this area, the regional economy remains strong.

The significance of the energy sector to Aberdeen City and Shire is stressed in the very first paragraph of the plan (para 1.1) as well as the first paragraph of this objective (para 4.1) and elsewhere in the plan. Additional targets and actions as suggested would not add to the status already afforded by the plan as energy (including renewables) is already a fundamental component of the economic growth agenda for the area.

The plan also already recognises the importance of healthcare facilities and the development of the Foresterhill site in particular (as noted in representation PP213d). It is not the role of the SDP to highlight the largest employers or existing business parks in the area, or to be site-specific unless this is necessary.

The Aberdeen Energy and Innovation Parks are within Aberdeen City and therefore within the Aberdeen City Strategic Growth Area (as appears to be noted from the terms of the representation – PP198a). The Aberdeen Local Development Plan (2012) identifies the sites required to meet the plan targets. This was done and included an extension to the Aberdeen Energy Park (SuppSDP/Doc11 - OP4). There is no need to identify the Aberdeen Energy and Innovation Parks within the plan as they are existing employment sites.

While the plan requires the allocation of land for employment uses, elsewhere in the plan there is a clear focus on the need for sustainable mixed-use communities. Many of the larger sites coming forward through the two LDPs are mixed-use in nature. It would not be appropriate to require this in all cases, but masterplans are required to explore the potential for a mix of uses on individual sites (final target on p37).

Recognition of Natura 2000 sites in site selection

PP064 – The plan emphasises (para 1.9) that it should be read as a whole, this minimises the need for repetition and continuous cross referencing. Paragraph 5.6 states that a Habitats Regulations Appraisal has been carried out and that further and more detailed assessments will be required at later LDP/project level stages to demonstrate

that development will not have adverse effects on the integrity of any Natura 2000 site. Given SDP's are designed to be concise visionary documents (Circular 1/2009, para 14, CC/Doc 9), it would not be appropriate to make reference, throughout different parts of the plan, to something which is already stated.

High-speed Broadband

PP219 – High-speed broadband is covered in paragraphs 3.6, 4.1, and 4.4, as well as the final target on page 25. While recognising the wider context of existing households (where the action of the two councils is focused – see SuppSDP/Doc27), the SDP focuses primarily on new development which is where it can have its most significant influence. The two councils and the Scottish Government are targeting the requested level of provision earlier than 2020 but this can largely be done with no input from the planning system.

There is no need to make any amendments to the proposed plan arising from these representations.

Reporter's conclusions:

Economic Growth/Sustainable Economic Growth

1. I deal here with the representation of Scottish Natural Heritage, which the authority had included under Issue 2, in regard to the lack of reference to sustainable economic growth in the Economic Growth Objective. Economic development proposals will require to be assessed in the overall context of the strategic development plan, which includes the Sustainable Development and Climate Change Objective. I am satisfied therefore, that there is no need in this chapter to effectively substitute all references to economic growth or development with references instead to sustainable economic growth. I have however, under Issue 2, recommended that paragraph 2.2 of the proposed plan be amended to reflect the Scottish Government purpose of increasing sustainable economic growth.

Retail

2. Paragraph 41 of Circular 6/2013: Development Planning identifies shopping as a principal topic for strategic development plans. Paragraph 53 of Scottish Planning Policy states that “development plans should identify a network of centres, and explain the role of each centre in the network”. Paragraph 56 goes on to indicate that “the development plan should enable gaps and deficiencies in provision of shopping...to be remedied by identifying appropriate locations for new development and regeneration”. Neither of those last 2 paragraphs specify that those matters must be addressed in the strategic development plan. I take that as an indication that planning authorities within the 4 SDP areas are free to exercise an element of discretion as to how those matters are to be addressed between the strategic and local development plans, depending on local circumstances.

3. I note the authority's response that the proposed plan does not quantify the amount of land to be allocated for new retail provision, but rather sets out how the sequential approach is to be applied in assessing retail proposals. Such development may be appropriate within or adjacent to existing centres, on mixed use sites, or on sites specifically allocated for retail development within the local development plans. I am

satisfied that this approach is consistent with the policy context set out above.

4. I agree with the authority that no substantive change has been made in the proposed plan to the approach to retail provision established in the current structure plan. I am satisfied that the importance of Aberdeen city centre is appropriately acknowledged in the plan. The authority contends that it would be inappropriate to identify the city centre as the priority location for new retail development. It seems to me that to do so would require all retail proposals, perhaps designed specifically to address the needs of town centres elsewhere within the plan area, to first be assessed for provision within the city centre. That would not be consistent with the sequential approach established in Scottish Planning Policy.

5. The proposed plan fails to establish a hierarchy of centres, and the authority explains that this is to be done in the local development plans. I agree that this is not a specific requirement of the Circular or Scottish Planning Policy, but find it odd that this matter, as it carries with it the potential for clear cross-boundary implications, is not addressed in the proposed plan. That said, I do not consider the proposed plan to be clearly insufficient or inappropriate in the policy context set out above. The authority may wish, however, to consider whether this matter ought to be addressed in a subsequent iteration of the strategic development plan.

6. The sequential approach is referred to in paragraph 4.2 of the proposed plan and is defined in the glossary. I find there to be no need, in the context of a concise document, as required at paragraph 41 of the Circular, for further explanation of this matter.

7. I agree with the authority that the proposed plan appropriately references the promotion of retail development throughout the plan area. Objective 6: *Sustainable Mixed Communities* makes it clear that development is to focus on the creation of mixed communities, where the needs (including retail) of residents is to be appropriately provided for within the community, reducing the need to travel.

8. The authority clarifies that the top-20 retail areas target refers to “the city and the city centre in particular”. I consider that this clarification ought to be clear on the face of the plan and recommend that the appropriate target be modified accordingly.

9. I am satisfied overall, subject to my reservation expressed at paragraph 5 above, that the proposed plan adequately establishes an appropriate context for retail provision within the plan area.

Scale of Employment Land Allocations

10. The Employment Land Audit 2012 (published in May 2013) indicates an established employment land supply of 926 hectares, an increase of 42% in Aberdeen City and 84 % in Aberdeenshire since 2011. Those increases are clearly significant and are said to result largely from the recent adoption of local development plans by both councils. The marketable employment land supply in Aberdeen City has increased by 44% to 125 hectares, and in Aberdeenshire by 88% to 397 hectares. I have no indication that these figures have been seriously disputed by any party.

11. Against that supply context, the audit reports that average take-up of employment land in Aberdeen City over the past 11 years is 3.6 hectares per annum and for Aberdeenshire some 13 hectares per annum. In 2011, take up in Aberdeenshire was

around 17 hectares. The audit goes on to state that in recent years take up of land has been much higher in Aberdeenshire, partly as a result of the shortage of suitable sites in Aberdeen, but there are indications that take up in both areas is increasing, with around 12 hectares under construction in Aberdeenshire and 10.2 hectares in Aberdeen City.

12. Taken together, the authority advises that the maximum annual completion rate over the past 12 years was 34 hectares, with the average completion rate amounting to 17 hectares per annum. On that basis, the authority states that at the maximum rate of completions experienced over the past 12 years, the established supply plus strategic reserve would last for almost 32 years, well beyond the 12 and even the 20 year time horizons of the plan.

13. Scottish Planning Policy advises, at paragraph 46, that development plans should provide for a range and choice of marketable employment sites to meet anticipated requirements. In the context of the supply and demand figures set out above (and explored in detail in the Employment Land Audit 2012), I find that: the supply figures set out in the Economic Growth targets, and at Figure 6, are generous and clearly more than sufficient; and that there is consequently no need to increase those supply targets.

14. Within that overall context, I am satisfied that there is no need to frame an additional target relating specifically to the supply of marketable employment land in Westhill, as sought in representation PP090 (referenced under Issue 10). That level of detail will be dealt with more appropriately at the local development plan level.

15. In addition, I am satisfied that the general tone of the Economic Growth section of the proposed plan is suitably positive and ambitious.

Employment Land – Strategic Reserve

16. The proposed plan, following the approach established in the current structure plan, requires that local development plans identify a strategic reserve of employment land for possible future use up to the 20 year time horizon. I do not accept that to do so results in the blighting of such land as is identified in this regard. It seems to me that, in the absence of this target, the plan would be inconsistent with the Circular 6/2013 requirement that strategic development plans provide a broad indication of the scale and direction of growth up to year 20. Equally, were specific sites not included in that strategic reserve, I have no indication that they would instead be allocated for immediate development. That being the case, I find that the allocation of specific sites as strategic reserve land is rightly a matter to be considered in the local development plans.

Sector and site recognition

17. The proposed plan appropriately acknowledges the role of the service sector in providing for economic growth, and sets a strategic context for that growth. The subsequent local development plans will be required to translate that strategic context to suit local circumstances, and I can see no need for the proposed plan to prescribe how that ought to be done in any greater detail than it already does.

18. I accept the authority's argument that while this section of the proposed plan provides for the allocation of sufficient employment land, other parts of the plan seek to achieve sustainable mixed use communities. The 6th target on page 37 requires local

development plans and all masterplans to fully consider the scope for mixed uses on each site. As the plan is intended to be read as a whole, I find that there is no clear requirement that the plan ought to specifically encourage employment land allocations in mixed use sites. Any requirement that employment allocations be required at a fixed proportion of residential units in such sites would be overly restrictive and would have no basis in Scottish Planning Policy.

19. The authority confirms that the Aberdeen Energy and Innovation Parks are within Aberdeen City and therefore within the Aberdeen City Strategic Growth Area. In that regard the Aberdeen Local Development Plan identifies the sites required to meet the plan targets. In this context I am satisfied that there is no convincing need to specifically identify the Aberdeen Energy and Innovation Parks within the proposed plan, nor to identify them as land which could accelerate development in the strategic growth areas. It will be for the local development plans to identify further specific sites to meet the targets set in this plan.

20. Paragraph 4.1 states that “To promote a diverse local economy we will have to build on our existing assets (particularly in the field of renewable energy)”. I am satisfied that this provision of the proposed plan appropriately acknowledges the importance of the renewable energy sector to the economic growth of the plan area. I do not consider that any additional target requiring that “Renewable energy development is integrated into economic growth plans for the area as much as is practical” would achieve anything not already provided for in the proposed plan, nor do I consider that such a target would be measurable.

21. Similarly, I am satisfied that the oil and gas industry is appropriately acknowledged in this section of the proposed plan and that any additional target relating to the marine energy sector is unnecessary.

22. The 4th bullet point on page 26 of the proposed plan acknowledges the role of NHS Grampian in the preparation of the Foresterhill Masterplan. I do not consider that additional reference to NHS Grampian as a significant employer would add any value to the plan.

23. Although not referenced by the authority in this Schedule 4, I note the wish of Scottish Enterprise to have an additional target included on page 25 of the proposed plan. This would highlight the need for the Aberdeen Local Development Plan to consider policies to attract more office development to the city centre. It is recommended under Issue 12 that paragraph 3.21 of the plan be modified to refer to the need to attract more office development to the city centre. I consider that modification to be sufficient in this regard. I do not in any event have sufficient evidence to frame a meaningful target; it will be for the Aberdeen Local Development Plan to consider how best to take this matter forward.

Recognition of Natura 2000 sites in site selection

24. It is stated in the Draft Habitats Regulations Appraisal that there is potential for likely significant effects on Natura 2000 sites, arising from development of the 4 strategic growth areas. Paragraph 1.9 of the proposed plan emphasises that the plan ought to be read as a whole, and paragraph 5.6 states that a Habitats Regulations Appraisal has been carried out and that further assessment will be required at the local development plan and project stages to demonstrate that development will not have adverse effects on

the integrity of any Natura 2000 site. I am satisfied that these references adequately set out the requirement for further appraisal. In the context of a concise document, it would be inappropriate to insert further references to the same matter in this section of the plan.

High-speed Broadband

25. The provision of high-speed broadband is clearly essential if especially those rural parts of the plan area are to remain desirable places to live and work in. This matter is referred to in paragraphs 3.6, 4.1 and 4.4 of the proposed plan and in the 5th target on page 25. The authority advises that the 2 councils are currently focussed on such provision in existing households, and that this requires little input from the strategic development plan. I agree that the target on page 25 appropriately refers only to new development, where the plan is likely to have the most significant influence.

Reporter’s recommendations:

I recommend that the following modification be made:

1. That the 4th target on page 25 be amended to read as follows: “For Aberdeen city centre to remain one of the top-20 retail areas in the UK.”

Issue 4	Sustainable Development and Climate Change	
Development plan reference:	Chapter 4, Objective 2, Page 28 - 32	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> Scottish Environment Protection Agency (PP031a) Shell UK Ltd (PP032a) Scottish Water (PP049) Kirkwood Homes Investments Ltd (PP095a) Shell UK Ltd (PP105) Scotia Homes (PP134b) The Greenspan Agency (PP207b) SHE Transmission plc (PP217b)</p> <p><u>Definition of Sustainable Development</u> Scottish Natural Heritage (PP079a)</p> <p><u>Climate Change</u> Mrs M Rutherford-Hurry (PP044a, PP045a)</p> <p><u>Energy Efficiency</u> Sandlaw Farming Ltd (PP037a) Mrs M Rutherford-Hurry (PP044b) Scottish Natural Heritage (PP065) Stewart Milne Homes (PP117) NHS Grampian (PP213e) North Kincardine Rural Community Council (PP224d) Homes for Scotland (PP233c) Bancon Developments Ltd (PP245b)</p> <p><u>Renewable Energy</u> Sandlaw Farming Ltd (PP037b) P Hales (PP043) Mrs M Rutherford-Hurry (PP044c) Scottish Natural Heritage (PP069) RES UK & Ireland (PP155) Fred Olsen Renewables Ltd (PP206e) North Kincardine Rural Community Council (PP224e)</p> <p><u>Carbon Capture and Storage</u> Mrs M Rutherford-Hurry (PP045b)</p> <p><u>Transport Emissions</u> E Hurry (PP041) Scottish Natural Heritage (PP066) D Fairlie Partnership (PP157)</p>		

<p><u>Renewable Heat</u> The Greenspan Agency (PP207c)</p> <p><u>Waste</u> Scottish Environment Protection Agency (PP031b) Kirkwood Homes Investment Ltd (PP095b) SITA UK (PP106) North Kincardine Rural Community Council (PP224c)</p> <p><u>Flooding</u> George Ingram (PP050) Scottish Natural Heritage (PP067) Cults, Bieldside & Milltimber Community Council (PP080)</p> <p><u>Water Efficiency</u> Scottish Natural Heritage (PP068) Scottish Natural Heritage (PP075) Stewart Milne Homes (PP118)</p> <p><u>Identification and safeguarding of pipeline corridors</u> Shell UK Ltd (PP032b)</p>	
Provision of the development plan to which the issue relates:	Sustainable Development and Climate Change
Planning authority's summary of the representation(s):	
<p><u>Support</u></p> <p>PP031a – We welcome the positive approach towards sustainable waste management in the Proposed Plan, the Plan identifies the key waste management direction for the north east and an indication of the scale and direction of growth for the lifetime of the plan. On the whole we consider that the Proposed Plan reflects well the requirements of the Zero Waste Plan Annex B by promoting co-operative working between local authorities, meeting waste management needs as locally as possible and providing an indication of where waste management facilities will be considered appropriate.</p> <p>PP032a – We support the recognition at paragraph 4.10 of the benefits and potential of the existing pipelines running throughout the SDP area.</p> <p>PP049 – General support for the proposed plans approach to water management.</p> <p>PP095a – Welcome that the complex issues and opportunities for dealing with waste arising in the area have been recognised in different parts of the plan.</p> <p>PP105 – Support for the recognition of the strategic importance of CCS opportunities at Peterhead and St Fergus and the inclusion of Peterhead CCS as a proposal within the plan.</p> <p>PP134b – Support the stated objective and targets.</p>	

PP207b – Supportive of the target for the city region’s electricity needs to be met from renewable sources by 2020.

PP217b – Welcome the reference to the national importance of electricity transmission developments and the reference to Peterhead as an important hub. Figure 7 (page 29) provides a helpful spatial illustration of the significant developments planned for the Peterhead area.

Definition of Sustainable Development

PP079a - The definition in the Glossary of sustainable development excludes the aspect of integration between the social, economic and environmental spheres.

Climate Change

PP044a, PP045a – Climate Change is a purely natural phenomenon, completely devoid of human interference. Public servants, Government officials and politicians are not adequately qualified to provide direction in this area and are perpetuating their particular agenda solely to satisfy the ‘Green Lobby’. Government research and information on climate change has never been subject to peer review (para 4.6).

Energy Efficiency

PP037a – The target for all new buildings to be carbon neutral by 2020 should be removed from the Plan. These matters can be more appropriately addressed by other regulatory means. The challenges and opportunities of climate change are important considerations, but in the current economic climate, they must be considered secondary. It is also welcome that these dates have been relaxed from those envisaged in the approved Structure Plan. However, to set such targets in isolation of the rest of Scotland and the wider UK could lead to the North East becoming uncompetitive in terms of securing new development.

PP044b – It is unreasonably inconvenient and costly to expect people living in older properties to retrofit energy saving technologies into their homes (para 4.7).

PP065 – The plan CC/Doc1 should be more definitive in stating that joint supplementary guidance will be prepared which will require new development to meet specific carbon dioxide levels through the sustainability labelling mechanism.

PP117 – It is not for the SDP to state that all new builds are to be carbon neutral by 2020. This is duplication of work, it is for local authorities to address carbon reduction measures and these are being regulated through Building Standards.

PP213e – General support for the plans approach to sustainable development and climate change. However, whilst the aspirations for the plan are to be carbon neutral by 2020 are laudable, the plan should concentrate on land use planning issues and avoid seeking to impose requirements which can be better dealt with under other regulatory mechanisms.

PP224d – The target for carbon neutral development should probably be extended beyond 2020.

PP233c, PP245b – an opportunity to interpret the Climate Change Act inventively has been missed. Developers widely promote the “fabric first” approach which looks at how the careful use of materials, design and construction of the houses can reduce energy consumption. The clear objective is to build high quality houses that will last. The use of micro-renewable technology in individual buildings to accord with the Climate Change Act is counterproductive. The 2010 Building Regulations can be met with fabric and construction methods. Micro-renewable technologies are expensive to install and maintain and are unpopular with customers. What has not been considered in the proposed Strategic Development Plan is the opportunity to offset the booming renewable energy industry in the region against housing development, to permit the development industry to concentrate firmly on building high quality homes with minimal energy consumption, thereby further improving the quality of life strived for in the vision and aims of the Plan.

Renewable Energy

PP037b – The target for all the City Regions needs to be met from renewable sources by 2020 should be removed from the Plan. These matters can be more appropriately addressed by other regulatory means.

PP043 - Significant electrical infrastructure is currently being installed on an ad-hoc local basis by the developers of onshore wind farm schemes. The design life of 25 years of most of these schemes falls within the time remit of the SDP. Options for the ongoing use of such sites will need to be considered and worked out within the next 20 years. Options could include some turbine replacement, the connection of other micro-generation schemes to the grid (e.g. bio-digestion and incineration), or the connection of energy intensive consumers in remote areas (e.g. intensive stock rearing).

PP044c – Strong objection to the plan suggesting that there is more capacity for onshore wind. Serious concerns relating to the development of wind turbines in Aberdeenshire on residents amenity and property prices. Concerns relating to perceived lack of technical knowledge of policy makers within the Government and disbelief in the merit and ability of wind power to contribute to Scotland’s energy supply. Concerns that the National policy stance on renewable energy has not been subject to public consultation (para 4.9).

PP069 – Chapter 4, Objective 2 of the plan (CC/Doc1), within the context of renewable energy and in particular onshore wind, should make reference to the potential impact on birds which are qualifying features of Natura 2000 sites (Special Protection Areas).

PP155 – Concerns relating to the wording in paragraph 4.9 of the proposed plan. The statement that there is only “some” more capacity for onshore wind may inhibit the areas of search for onshore wind and is not in keeping with the overall aims of the plan. This inference will go against the target in NPF 2 which predicts the greatest contribution of renewable energy will come from onshore wind and hydro- power schemes.

PP206e – Page 31 ('How to meet the targets', second bullet point) – should be re-worded so as to read 'Local development plans (and supplementary guidance) will identify areas (including preferred areas) for development or technology which can contribute to the supply of renewable energy'.

PP224e – *‘for the city region’s electricity needs to be met from renewable sources by 2020’* is surely wishful thinking. Renewable sources – granted the difficulties associated

with wave and offshore wind and the limited contribution of hydro, solar and bio-mass – effectively means very heavy dependence on onshore wind. To declare such a heavy commitment to wind would appear to offer a hostage to fortune either because of lack of continuity of supply or on account of increased costs by paying extra for ‘green’ sources or indeed paying extra for emergency provision at times of shortage. In 2020 we shall be using fossil fuel, hydro-carbons and nuclear to provide 75% + of our electricity and there is no alternative as wind-based production cannot be stored. Even with blanket coverage of turbines, the lights would go out without those essential back-ups. This target is not only ambitious and idealised, but wildly impractical.

Carbon Capture and Storage

PP045b -There is no scientific evidence to back up the value of carbon capture and storage to justify its inclusion in the plan.

Transport Emissions

PP041 – It is unacceptable that the tax payer should be left to foot the bill for providing electric car charging points. There are negligible effects of transport on climate change and any such initiatives should be funded by the private sector in return for a fast tracking their planning applications which include these facilities.

PP066, PP157 – Paragraph 4.8 discusses the contribution of transport emissions to climate change, and the need to mitigate this as part of the plan. While it discusses cleaner fuels, it doesn't mention modal shift to active travel. Although this is covered later under Accessibility, this paragraph seems incomplete in the context of climate change without mentioning it here.

Renewable Heat

PP207c – Electricity is just one sector of energy us and renewable heat has the potential during the lifetime of the plan to begin the decarbonisation of another sector. The SDP should clearly indicate the need and benefits of such development as well as explicit support for the aims of the Renewable Heat Incentive and the Climate Change (Scotland) Act 2009.

Waste

PP031b – There is an opportunity for the actions in the Action Programme (Actions 81 – 83) to be linked more closely with those actions identified in the plan itself under ‘How to meet the targets’ by amending bullet 4 to mention integrating waste management into all development proposals and managing waste during the construction and demolition phases of development.

PP095b – The plan falls short of its own vision in relation to waste, remaining passively reactive rather than actively seizing opportunities. It also needs to change its language from ‘waste management’ towards the concept of resource capture and utilisation.

PP106 – Fully support the management of waste in line with the waste hierarchy, proximity principle and the Zero Waste Plan, but would caution that the 'proximity principle' has evolved in planning policy and case law over recent years. Appropriate guidance in Scotland is now given by section 4 of Annex B to the Zero Waste Plan, which

asks Planning Authorities to be mindful that "need and proximity for waste management facilities should be considered strategically as the achievement of a sustainable strategy may involve waste crossing planning boundaries within Scotland".

The obligation in the Waste Framework Directive is "to enable waste to be disposed of or... recovered in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health". Travel distance is only one consideration in identifying an 'appropriate location' which needs to be balanced against all other relevant considerations such as environmental performance, deliverability and cost. This consideration of other factors is reflected in the identification of the Strategic Growth Areas in the Plan along the strategic transport routes, but as outlined in our previous representations to the plan, the limitation of 75% of new waste management developments to within the parts of the SGAs closest to Aberdeen is overly restrictive. It may also be skewed towards housing distribution when in fact commercial and industrial waste arisings far exceed those of municipal origin.

The 'around 75%' should relate to the whole of the Strategic Growth Areas, allowing for 25% to come forward outside these areas provided they can show good sustainability reasons for the chosen location.

PP224c – To adopt in full Scotland's Zero Waste Plan (limiting waste sent to landfill to 5% by 2025) represents such a big change from existing practice that the SDP should recognise the possibility (likelihood?) of falling short and place a duty on local authorities to seek to identify further, emergency, sites through Local Plans.

Flooding

PP050 – Concerns over the rising sea level and the impact of fluvial flooding.

PP067 – Paragraph 4.11 of the plan (CC/Doc1) should also promote consideration of managed coastal realignment where appropriate. This would be in accordance with SPP para 103.

PP080 - The section on Targets on page 31 talks about avoiding developments on land which is at an unacceptable risk from coastal or river flooding ... except in exceptional circumstances. The section later talks about the exceptions being brownfield sites which have appropriate flood prevention measures in place.

Is it clear that brownfield sites with appropriate flood prevention measures in place are the only allowable exceptions?

Water Efficiency

PP068 – Further reference should be made throughout the plan to protecting the environmental quality of the River Dee. The mitigation measures should be given more weight and greater detail should be provided on current work being undertaken by relevant agencies. Reference should be made to the SEA and HRA in relation to the River Dee.

PP118 - We do not accept that the SDP should have targets in relation to water efficiency. Seeking all new developments to use water saving technologies through

planning policy presents significant complications when planning policy and building regulation standards are not aligned. This is particularly the case when planning policy seeks to set standards higher than those set through the current building regulations. Water efficiency is part of the building regulations and the standards will increase in future years in line with Government targets. The SDP should tackle the bigger issue of infrastructure provision through the appropriate body, Scottish Water. Scottish Water have a duty to provide access to water and drainage capacity. If this infrastructure does not currently exist, although small savings in water efficiency can be made through the building regulations and changing domestic habits, the larger issue remains that there is insufficient water capacity for the city region and this is what needs to be tackled by the Strategic Development Planning Authority.

Identification and safeguarding of pipeline corridors

PP032b – Request that as national planning policy supports the recognition and protection of pipelines, this should be reflected within the Aberdeen City and Shire SDP to ensure consistency within the planning process. The existing pipeline corridors should be recognised and given appropriate policy protection.

Modifications sought by those submitting representations:

Support

PP031a, PP032a, PP049, PP095a, PP105, PP134b, PP207b, PP217b – None sought (supportive).

Definition of Sustainable Development

PP079a - A sentence added to the end of the definition in the Glossary pp – 48: *Development should integrate economic, social and environmental objectives.*

Climate Change

PP044a, PP045a – Not specified.

Energy Efficiency

PP037a – The target for all new buildings to be carbon neutral by 2020 should be removed from the Plan.

PP044b – Not specified.

PP065 – The fourth sentence of paragraph 4.7 to be amended to read: *Joint supplementary guidance will be prepared.*

PP117 – Remove from Targets, para 4.17 of the proposed plan (CC/Doc1) the requirement for all buildings to be carbon neutral by 2020. Add that specific sustainability requirements of buildings will be the responsibility of Building Control through the implementation of Building Regulations.

PP213e – None specified.

PP224d – The target for carbon neutral development should probably be extended beyond 2020.

PP233c, PP245b - Considering the housing requirement, and setting an achievable target for renewable energy production across each Local Development Plan area to offset that, and allowing the Building Standards to address the technical construction and design issues, will simplify the building process and facilitate the quicker and more efficient provision of the housing required.

Renewable Energy

PP037b, PP224e – The target for all the City Regions needs to be met from renewable sources by 2020 should be removed from the Plan.

PP043 - I suggest that the SDP should contain a target to optimise the use of existing and consented wind farm generation and infrastructure. The two Councils should commit to carrying out an engineering study which will gather data on individual wind farm schemes and examine the options for re-configuring or decommissioning the installed infrastructure as the schemes come to the end of their 25 year design lives.

PP044c – Amend paragraph 4.9 to read: *We also need to tackle the supply of energy during the plan period by upgrading existing power stations which is the only reliable way to meet the increasing demand for energy. There is no more capacity for onshore wind and there is considerable public resistance to offshore wind, therefore we must source more of our energy from waste (instead of shipping it to China for landfill), solar, biomass and air source heat pumps.*

PP069 – Amend the second of the ‘How to meet the targets’ bullet points on page 31 to: *“Local Development Plans (and supplementary guidance) will identify areas or technology which can contribute to the supply of renewable energy which directs development away from sensitive areas”.*

PP155 – Remove the word “some” from sentence 3 in paragraph 4.9.

PP206e – Page 31 ('How to meet the targets', second bullet point) – should be re-worded so as to read 'Local development plans (and supplementary guidance) will identify areas (including preferred areas) for development or technology which can contribute to the supply of renewable energy'.

Carbon Capture and Storage

PP045b – On page 29, delete the whole paragraph starting: *Carbon capture and storage.*

Transport Emissions

PP041 – Suggested change para 4.8 to: *The effects of transport on climate change are negligible. However, for those drivers who wish to switch to alternative fuels, we will encourage private sector companies (such as ASDA, Tesco, etc.) to provide facilities for LPG pumps and electric vehicle charging points by fast tracking their planning applications for such facilities. We will similarly encourage private sector companies to install charging points in their employee car parks. We will not ask hard-pressed taxpayers to foot the bill for these facilities.*

PP066 – Add an additional sentence at the end of paragraph 4.8: *“We will also need to encourage walking and cycling as an alternative to the use of private car by designing developments that incorporate strategic and local walking and cycling routes”.*

PP157 – Include a new paragraph which specifically talks about the desire to promote all development in such a way that the need to travel by any form of motorised transport is reduced. Include a target that identifies a large proportion of all development (residential, employment and energy) to be in close proximity to each other such that the need to use motorised transport is reduced.

Renewable Heat

PP207c – References to biogas, anaerobic digestion of energy crops or waste, the Renewable Heat Incentive and the Climate Change (Scotland) Act 2009.

Waste

PP031b – We recommend that the 4th bulletpoint under ‘How to meet the targets’ be amended to read...*“The two councils should work together to identify and put in place residual waste management solutions. Local development plans (and supplementary guidance) will promote the integration of waste management into all development proposals and management of waste during the construction / demolition phases of development.”*

PP095b – There should be specific policy statements that support the import of waste to ensure financial viability, the 300,000 tonnes figure for new capacity should be deleted and the myopic focus on municipal waste should be addressed in the plan.

PP106 – Amendments are suggested to two paragraphs.

Paragraph 3.12, second sentence should be reworded to read: *“Most of this should be located in the strategic growth areas.”*

Paragraph 4.15, second and third sentences should be replaced with: *“We should develop these new facilities in sustainable locations, with around 75% of them being in the strategic growth areas. Outwith these areas, facilities should generally meet a more local need or need to be in a rural location and should demonstrate good sustainability reasons for the chosen location.”*

PP224c – The SDP should place a duty on local authorities to seek to identify further, emergency, sites through Local Plans.

Flooding

PP050 - None specified

PP067 – Add new third sentence in 4.11 of the plan (CC/Doc1): *“Another measure is to allow in appropriate locations for coastal processes by positive management for the realignment of the coast inland, enabling valuable wildlife habitats to form”.*

PP080 – The following paragraph should be included in the Targets section, page 31...*“A new development will not be approved in areas with an unacceptable risk of flooding*

unless it is on a brownfield site which has appropriate flood prevention measures in place.”

Water Efficiency

PP118 - Delete the target for all new developments to use water saving technologies. Replace with targets for Scottish Water to achieve in terms of delivering water and drainage infrastructure.

PP068 – Amend the third target on page 31 associated with paragraph 4.17: *To avoid the volume of water taken from the River Dee as a result of the new development proposed in the plan having a negative effect on the river’s status as a special area of conservation, taking also into account as information allows the effects of climate change”.*

Add two further ‘how to meet the targets’ on page 31:

“Scottish Environmental Protection Agency in consultation with Scottish Natural Heritage will licence the taking of water by Scottish Water to provide for existing and future development to a level that protects the River Dee Special Area of Conservation”.

“Local Development Plans (and supplementary guidance) will promote water efficiency and water saving measures in all new developments”.

And the following to the end of the 3rd bullet ‘how to meet the targets’ on page 31
“...including preparation of a water shortage plan”.

Identification and safeguarding of pipeline corridors

PP032b – The existing pipeline corridors should be recognised and given appropriate policy protection.

Summary of responses (including reasons) by planning authority:

Support

PP031a, PP032a, PP049, PP105, PP134b, PP207b, PP217b – Support welcomed

Definition of Sustainable Development

PP079a - The definition of sustainable development in the Glossary (p 48) outlines that: for development to be sustainable it must take into consideration the impact on all of the three key spheres of community, economy and the environment at both the local and the global scale. This is an acceptable and widely accepted definition. The definition is the same as the one in the current approved structure plan.

Climate Change

PP044a, PP045a – The proposed plan (CC/Doc1) has taken clear direction from SPP and NPF 2 in the way it addresses issues of climate change mitigation and adaptation. SPP (CC/Doc11) para 42 states, the need to help mitigate the causes of climate change and the need to adapt to its short and long term impacts should be taken into account in all decisions throughout the planning system. NPF 2 (CC/Doc12) para 16 – 20 state that

one of the principle challenges facing Scotland is climate change, the impacts of which are already being felt and if ignored climate change will have significant adverse effects on the environment and the quality of life we currently enjoy. These commitments are outlined in the Climate Change (Scotland) Act 2009 (CC/Doc15). The Intergovernmental Panel on Climate Change (a scientific intergovernmental body) provide an accepted authority on climate change, which is peer reviewed and open to international scrutiny.

Energy Efficiency

PP037a, PP044b, PP065, PP117, PP213e, PP224d, PP233c, PP245b – Saving energy through energy efficiency is vital to address climate change but also has social, health and economic benefits as well.

Scottish Planning Policy (CC/Doc11, para 37) makes it clear that “[d]ecision making in the planning system should...contribute to the reduction of greenhouse gas emissions...contribute to reducing energy consumption and to the development of renewable energy generation opportunities”. It also highlights section 44 of the Climate Change (Scotland) Act 2009, which “requires all public bodies to act in the way best calculated to contribute to the delivery of the emissions targets in the Act; in the way best calculated to help deliver the Government’s climate change adaptation programme, and in a way that it considers is most sustainable” (CC/Doc15, s44). The plan explicitly supports the initial focus on energy efficiency (para 4.7) as this is likely to be the most efficient approach to reducing energy demand. SDPs do not have an explicit role in the implementation of s72 of the Climate Change (Scotland) Act 2009 but it must be complied with by local development plans. It is not open to the SDP to stand in the way of legal compliance with the Climate Change (Scotland) Act 2009. The planning system therefore has a role to play in the move towards carbon neutral development, alongside Building Standards.

Target 1 on page 31 of the plan is for all new builds to be carbon neutral by 2020 (not for the area to be carbon neutral as stated in PP213).

Climate change issues cannot be considered to be of a secondary nature in the current economic climate. It is recognised that reducing the carbon impact of new development is potentially more challenging, hence moving of the target date from 2016 in the current structure plan to 2020. However, the vision of the plan (page 6) recognises the leading role that Aberdeen City and Shire can and should take in development being more sustainable, particularly given the more resilient nature of the local economy. It is still seven years to go before 2020 and this seems a reasonable target for the SDP to set.

The plan recognises that improvements will need to be made in existing as well as new development (para 4.7). It is recognised that making older traditional builds more energy efficient will not be easy or straightforward, but this is certainly not to say it cannot be achieved. Government grants and initiatives such as the ‘Green Deal’ are designed to encourage and offer financial incentives to residents who wish to make energy saving changes to their homes.

The plan targets all new buildings being carbon neutral by 2020 (‘target 1’ on p31) and identifies local development plans (and supplementary guidance) being used to promote this gradual move (‘how to meet the targets’ 1 on p31). Paragraph 4.7 (and its suggestion of potential joint guidance) needs to be read in this context. While action is required, whether it is done jointly is a matter for the two councils to decide. This is appropriate and

no change to the plan is required.

Renewable Energy

PP037b, PP043, PP044c, PP069, PP155, PP206e, PP224e – The planning system is vital to the delivery of renewable energy and has a key role to play in meeting the Scottish Government’s targets. Other regulatory mechanisms are not better placed to address them. Scottish Planning Policy (CC/Doc11, para 37) makes it clear that “[d]ecision making in the planning system should...contribute to the development of renewable energy generation opportunities”. Scottish Planning Policy (CC/Doc11, para 44) also highlights section 44 of the Climate Change (Scotland) Act 2009, which “requires all public bodies to act in the way best calculated to contribute to the delivery of the emissions targets in the Act...and in a way that it considers is most sustainable.”

There will be a range of energy generating technologies operating in the UK, Scotland and even Aberdeen City and Shire in 2020, including the gas fired power station at Peterhead. While the target of the plan is to generate enough renewable energy to cover demand in Aberdeen City and Shire across the year, energy supply is balanced at a UK level. Energy storage options are likely to be brought forward (including the use of hydrogen), with the NorthConnect link to Norway designed in part to enable energy storage in Norway’s pumped storage hydro projects. However, fundamentally electricity is constantly moving around the UK (proposals are included within the plan to support this) and can be appropriately balanced at that spatial scale.

The plan makes it clear that reliance on onshore wind would not be appropriate (para 4.9) and that a more balanced mix of renewable sources is required. Paragraph 4.9 of the plan states that there is some extra capacity for onshore wind within the region, not that onshore wind is a panacea for energy supply within the region or that there is no more capacity. Two representations (PP044 and PP155) seek amendments along these lines. While there will be some additional capacity (and a study is currently being carried out by Aberdeenshire Council with Scottish Natural Heritage to look at this issue), there are limits to the capacity for wind turbines in Aberdeenshire given that there are already 870 consented turbines (and a further 248 turbines as part of current applications).

In paragraphs 4.9 and 4.10 of the plan it is clearly stated that onshore wind will be only part of the solution, with a more balanced mix of renewables required if we are to achieve the local, regional and national targets. This approach is in line with NPF2 (CC/Doc12) paragraphs 5, 65 and 146 and SPP (CC/Doc11) paragraph 185, which highlight that while onshore wind has been central to the renewable development to date, it will increasingly become only part of the bigger picture and the longer term potential is likely to lie within other technologies.

National as well as regional and local planning policy is open to public involvement and consultation. Opportunities are provided for stakeholders, communities and individuals to participate.

Local planning authorities can only assess applications for onshore wind proposals on a case by case basis in the context of national and local policy.

There is no need to explicitly state that LDPs and supplementary guidance will direct development away from sensitive areas. This issue is covered elsewhere in the plan (paragraph 4.28 for example) and does not just apply to renewable energy. The plan

avoids repetition and cross referencing by stating at the start (para 1.9) that the plan must be read as a whole. Para 5.6 of the plan covers the specifics of impacts on any Natura 2000 sites.

Inserting text ('including preferred areas') into the second action on p31 does not add anything to the existing sentence. The action is already positive about renewable energy rather than focusing on constraints.

Planning consents for onshore wind farms contain restoration clauses requiring site restoration in the event that the turbines cease to generate electricity for a specified period of time. The policy and financial landscape for renewable energy is impossible to predict in 10 – 20 years' time and it is therefore premature to start considering alternative uses for such sites. However, there will come a time when thought will need to be given to the options for such sites, including whether they remain suitable for replacement turbines.

Carbon Capture and Storage

PP045b – NPF 2 (CC/Doc12) paragraphs 70 and 71 highlights that there is real potential in Scotland for Carbon Capture and Storage. This is something which the proposed plan takes forward through the identification and designation of northern parts of Aberdeenshire as potentially having a very important role to play in the emerging CCS technologies and industries. The proposal at Peterhead is on the shortlist for UK Government funding of up to £1bn to demonstrate the technology at a commercial scale. There is a considerable body of scientific literature and ongoing research into CCS and practical examples of deployment. Scottish Carbon Capture and Storage is a partnership of the British Geological Survey and a number of Scottish universities which has a leading role in this research and there is also a taught Masters (MSc) course at the University of Edinburgh. The Global CCS Institute publish an annual status report (SuppSDP/Doc18), while Scotland's potential for CO2 storage is also subject to significant research (SuppSDP/Doc31).

Transport Emissions

PP041, PP066, PP157 – Transport emissions account for almost 25% of Scotland's total emissions (with more than two thirds of these coming from road transport), with decarbonising vehicles being the Scottish Government's focus over the coming years (2nd draft RPP SuppSDP/Doc35, paras 7.11 and 7.4.8). Scottish Government plans for increasing the use of electric cars will include subsidies in the initial stages. As part of the UK-wide 'Plugged in Places' initiative, electric vehicle charging points are due to be installed in both Aberdeen City and Aberdeenshire. However, the private sector will (over time) need to take the development of the network of charging infrastructure forward. While some developers already offer charging points as options in new development, this will increasingly need to be the norm. The text of the plan is in line with draft SPP (para 194) and no changes to the plan should be made.

While it is recognised that active travel will contribute to reducing carbon emissions and climate change, it is not necessary to restate a commitment to encouraging active travel again in this section of the plan (or para 4.11 in particular). The plan must be read as a whole (paragraph 1.9). The aims of the plan (page 6) include the need to reduce the need for people to travel and make walking; cycling and public transport more attractive alternatives. Chapter 4, objective 6, page 38 – 39 outlines the importance of encouraging

active travel as well as public transport. Para 3.10 of the plan (CC/Doc1) states that opportunities should be taken to incorporate active travel routes into Strategic Growth Areas.

Renewable Heat

PP207c – There is no need to explicitly mention ‘biogas’, ‘anaerobic digestion of energy crops or waste’ in para 4.9 or the ‘Renewable Heat Incentive’. Para 4.9 was never intended to (and cannot hope to) be a comprehensive list of sources of renewable energy. However, the list includes both sources of renewable electricity as well as renewable heat (examples include energy from waste and ground, water and air source heat pumps). The paragraph also makes clear that we need a more balanced mix of renewable energy sources. Combined heat and power is mentioned in para 4.7 and energy from waste again in para 4.16. The definition of ‘carbon neutral’ in the glossary also explicitly mentions heat. Explicit mention of the Renewable Heat Incentive would add nothing to the plan. The Climate Change (Scotland) Act 2009 is already mentioned in the ‘Influences on the plan’ section (para 1.15).

Waste

PP031b, PP095b, PP106, PP224c – The proposed plan is in line with Annex B to the Zero Waste Plan. There has been no representation by the Scottish Government on this issue, while SEPA has expressed support (PP031a).

The plan allows for waste crossing planning authority boundaries and the waste issue has been considered strategically. The spatial strategy of the plan directs waste management facilities both towards those areas best served by rail and/or dual carriageway roads as well as those areas most in line with a strategic application of the proximity principle. This is appropriate for both waste generated within the area as well as waste ‘imported’ from other parts of Scotland.

The local development plans will need to consider identifying sites for waste management facilities in accordance with strategic context set out in paragraphs 4.15 and 4.16. However, it would not be appropriate to identify additional landfill sites as doing so would act contrary to the push for more sustainable management of waste. Paragraph 4.14 makes it clear that there is sufficient capacity at the current time at landfill sites as demonstrated in the Monitoring Statement (CC/Doc5h, pages 31 and 32). Since the Monitoring Statement was published, the 10-year rolling landfill capacity requirement has been reduced to 3.8m tonnes, further increasing the buffer available.

The suggested additions to the text concerning integrating waste management into all development proposals and construction/demolition waste are already referenced in paragraph 4.16 of the plan and the Action Programme (CC/Doc4a, actions c). There is no need to repeat it. In any event, the target in the plan is about working towards an extra 300,000 tonnes of new waste management infrastructure, not site-specific waste issues.

The plan does not seek to impose a cap at 300,000 tonnes of waste management infrastructure but the figure is useful in providing a scale to the likely requirements. This figure is the best currently available and should therefore be retained. The plan will be reviewed every five years and therefore kept up-to-date as more information becomes available.

The plan is not myopic in its focus. The focus of Scottish Government policy is to leave as much as possible to the market to provide and the proposed SDP is consistent with this approach. The capacity requirement for at least 300,000 tonnes is for all waste arisings, not just municipal waste.

Flooding

PP050, PP067, PP080 – The plan deals with issues of flooding in para 4.17, in which it states that development which could pose an unacceptable risk to coastal or river flooding, should be avoided. A Strategic Flood Risk Assessment (SFRA) (CC/Doc4d) as well as a Strategic Environmental Assessment (SEA) (CC/Doc4b) has been prepared to accompany the plan. The SFRA addresses the key issues identified in relation to the flood risk associated with the proposals in the plan. The Scottish Environment Protection Agency (SEPA) were consulted throughout the preparation of the plan and have welcomed the proposed plan and the SFRA.

This plan is focused primarily on the relationship of flood risk to development, rather than how coastal process in general should be managed. No areas have been identified for the managed realignment of the coast (SPP CC/Doc11 para 103) so the suggested additional text is outwith the scope of the current plan.

Brownfield sites with appropriate flood prevention measures in place are one potentially allowable exception but there may be others and it would not be appropriate to be too prescriptive in the SDP.

Water Efficiency

PP068, PP118 – The efficient use of resources is fundamental to sustainable development and is integral to the first main aim of the proposed plan (page 6). Water efficiency is important not just because of the need to conserve water but also because the treatment and transportation of water as well as the treatment of waste water is very energy intensive (with associated carbon emissions). Using water more efficiently is much more sustainable than large capital projects to provide more capacity, from both an economic as well as an environmental perspective.

Water efficiency is not currently part of Building Standards in Scotland. It is included within the 'Sustainability Labelling' but this sets voluntary rather than mandatory levels of water efficiency.

At a regional scale, para 4.17 of the proposed plan makes it clear that the River Dee is the region's main source of drinking water but also a Special Area of Conservation. Using water more efficiently is not a small matter, it is vital for the future growth of the area and was of critical importance to the Habitats Regulations Appraisal Record (CC/Doc4c) prepared for the plan due to the concerns of SNH over abstraction levels. The Proposed Action Programme (CC/Doc4a, Action 84) includes actions designed to look at the River Dee in more detail to inform Scottish Water's analysis of future water supply infrastructure requirements for the area.

The first proposed addition action focused on abstraction licences and is a matter between SEPA, SNH and Scottish Water and nothing to do with the planning system. As such, the SDP is not the place for SNH to try to achieve this objective. Although not advocated as a modification to the plan, if necessary, the final sentence of paragraph

4.17 could be amended in such a way that the importance of the issue could be more strongly conveyed...“During and beyond the period of this plan the effects of climate change may affect the river and appropriate adaptation measures may have to be taken by a range of organisations. This could include measures such as reducing the amount of water Scottish Water are licensed to take from the River Dee”.

The second proposed additional action related to water efficiency and water saving measures. While not necessary, the proposed addition would be acceptable. The current structure plan contained a related action...“Local development plans (and supplementary guidance) should make it a requirement for water-saving technology to be used in all new developments”. It was omitted this time to avoid duplication because there is a prospect of the revised Building Regulations containing water efficiency measures. The importance of the issue is not diminished by not including this action and it will still be an issue that LDPs will need to address.

The suggested amendment to ‘how to meet the targets’ bullet 3 on page 31 is unnecessary. The issue of water shortage plans is already covered within the general statement about adaptation measures. It was identified in the Habitats Regulations Appraisal as a mitigation measure and should have been included in the Action Programme. This has now been rectified and there is no need to include it within the plan itself.

Identification and safeguarding of pipeline corridors

PP032b – While the importance of existing pipelines is recognised, it is not necessary to highlight this in the SDP beyond the references to the potential to transport CO₂ for the purposes of deploying carbon capture and storage (para 4.10, bullet 2). Existing pipelines already receive a high level of protection through the application of the PADHI Guidelines through development management procedures. This approach is consistent with the report of the examination of the SESplan SDP (SuppSDP/Doc36, Issue 25 Conclusions, para 9).

There is no need to make any amendments to the proposed plan arising from these representations.

Reporter’s conclusions:

Definition of Sustainable Development

1. Firstly I note that the glossary definition of sustainable development has been rolled forward from the approved structure plan without change. No clear change in circumstances has been brought to my attention that would warrant a change from the definition established in the approved development plan.
2. In any event, while there is no single universally accepted definition of sustainable development, I agree with the authority that the form of words used in the first sentence of this section of the glossary is widely used. It is also helpful that the definition includes references to social, economic and environmental elements, and to the local and global applications of the term. I conclude that no modification is necessary.

Climate Change

3. The science of climate change is complex and passionately argued over. As a global phenomenon, it does not fall to individual strategic development planning authorities to independently review and reach conclusions on the range of scientific opinion that exists. Rather, the starting points for the plan's consideration of climate change should be the requirement to take account of the National Planning Framework, the expectation that the plan should comply with Scottish Planning Policy, and the greenhouse gas emissions targets set out in the Climate Change (Scotland) Act 2009. These national considerations clearly point to the strategic development plan taking a broadly positive approach towards measures aimed at reducing greenhouse gas emissions.

4. Paragraph 18 of the National Planning Framework states that substantial reductions in greenhouse gas emissions will be necessary to minimise the impacts of climate change. As highlighted by the authority, paragraph 42 of Scottish Planning Policy requires climate change mitigation and adaptation to be taken into account throughout the planning system. The Climate Change Act places a duty on public bodies to act in the way best calculated to contribute to the Act's emissions reduction targets.

5. Given these national considerations, I conclude that the plan's overall approach of seeking to reduce greenhouse gas emissions and adapt to the effects of climate change should be maintained.

Energy Efficiency

6. Several representations under this sub-heading oppose the proposed plan's target for all new buildings to be carbon neutral by 2020, either on the basis that this matter should be addressed by other regulatory regimes such as building standards, or because it will bring higher costs and make the region uncompetitive. It is also argued that it would be better to have a more gradualist approach, concentrate on improving the existing stock, or extend the target date beyond 2020.

7. The general approach of seeking carbon neutrality in new buildings by a target date was established in the approved structure plan. A possible change in circumstance that has occurred since then is the length of the economic downturn that the UK has experienced in recent years. However, while this might affect the speed with which this target can be achieved it is less relevant to the principle of whether such a target should be in the plan. In any event, the authority has responded to the changed economic climate by moving the target date for achieving carbon neutrality back from 2016 to 2020. This change also goes some way to addressing concerns about the target resulting in excessive costs and making the region uncompetitive.

8. In terms of the potential role of the planning system in considering the energy efficiency of new buildings, I note that paragraph 39 of Scottish Planning Policy states that planning decisions on the design of new development should "encourage energy efficiency through the orientation and design of buildings, choice of materials, and the use of low and zero carbon generating technologies". Thus there appears to be some support in national policy for the planning system taking a role in promoting energy efficiency.

9. The planning system's principal interest is in new development. Regardless of the desirability of securing energy efficiency improvements in older stock, it is therefore

understandable why the focus of the target in the proposed plan should be new buildings. Some representees promote a ‘fabric-first’ approach to securing energy efficiency. One advantage of the general way in which the target is worded is that carbon neutrality can be achieved in a number of ways. These may include through choice of materials as well as through orientation and design or low and zero carbon generating technologies.

10. Overall I conclude that the target relating to carbon neutrality is appropriate and no modification is required.

11. Several representees propose a means of interpreting the requirements of Section 72 of the Climate Change (Scotland) Act in a way that would allow emissions from housing development to be offset against renewable energy production in the region. There is no support in national policy for making such a link between unrelated developments. In any event, Section 72 is directed at local development plans, and does not appear to allow for the type of mechanism promoted in representations. The proposed strategic development plan does not contain any specific requirement for the installation of low and zero carbon generating technologies or express any preference for these ahead of other means of achieving carbon neutrality.

12. Scottish Natural Heritage seeks a stronger level of commitment in the proposed plan to the preparation of joint supplementary guidance on the use of sustainability labelling. The authority’s response explains that no final decision has yet been made on this matter. In my view, either of the two approaches of preparing joint guidance or Aberdeen City and Aberdeenshire Councils preparing individual pieces of guidance could be effective. The sustainability of individual buildings is not identified in either Scottish Planning Policy or paragraph 41 of Circular 6/2013: Development Planning as a topic that specifically needs to be covered at the strategic development plan level, so I am satisfied that this is a topic that may be equally satisfactorily dealt with in supplementary guidance associated with local development plans.

13. Mrs Hurry expresses concern about the reference in paragraph 4.7 of the proposed plan to the need to improve energy efficiency in existing as well as new property. I agree that the planning system will have a very limited role in improving the energy efficiency of older property. However I interpret the reference to older property as being intended to put the actions that the plan does propose (relating to new development) into a wider context. This context is one which recognises that such action is only a part of the wider changes that will need to occur in the built environment to tackle climate change. It is clear to me that the plan does not require energy efficiency measures to be carried out to existing property, and indeed such a requirement could not be implemented through the planning system. On this basis I conclude that no modification is required.

Renewable Energy

14. Representees criticise the target for the region’s electricity needs to be met from renewable sources by 2020 for potentially making the region uncompetitive, and being unrealistic. It is suggested that other forms of generation will still be required at this date. It is also suggested that this issue should be addressed through regulatory means other than the planning system.

15. Firstly I note that this target has been rolled forward from the approved structure plan. No changes in circumstance have been highlighted to me in the particular representation relating to the target. However, there have been some changes in

national policy since the approval of the existing plan, including the publication of the Routemap for Renewable Energy in Scotland and the consolidated Scottish Planning Policy containing a new section on sustainable development. I have therefore considered whether this target remains appropriate.

16. The 2020 Routemap for Renewable Energy in Scotland expresses the Scottish Government's target to generate the equivalent of 100% of Scotland's gross annual electricity consumption from renewable sources by 2020. Paragraph 184 of Scottish Planning Policy requires planning authorities to support the development of a diverse range of renewable energy technologies. Paragraph 145 of National Planning Framework 2 expresses the Government's commitment to establishing Scotland as a leading location for the development of renewable energy technology. Thus it is clear that the planning system is expected to play an important role in supporting renewable power generation through its consideration of development proposals. I therefore conclude that it is appropriate for the strategic development plan to contain an ambitious but achievable target for renewable energy generation.

17. The 100% target contained in the Routemap for Renewable Energy in Scotland was announced in 2011 and is higher than the 50% target expressed in Scottish Planning Policy. The target in the proposed plan therefore now matches the national target. However, the North Kincardine Rural Community Council is correct to point out that there will still be a requirement for fossil fuel power generation in 2020 to ensure continuity of supply. The authority themselves acknowledge that the gas-fired power station at Peterhead will remain operational in 2020. The key point is that the national target relates to the equivalent of 100% of electricity demand. The lack of reference to equivalence in the proposed plan target is confusing. I therefore recommend a modification to remedy this.

18. Regarding the representations questioning the capacity for further onshore wind development in Aberdeen City and Shire, detailed analysis of this capacity is not practical within the confines of this examination. In any event, no detailed or persuasive evidence has been provided to suggest that there is no further capacity. I am therefore content that the statement in the proposed plan that there is some extra capacity for onshore wind is appropriate, given that the scale of this is not defined.

19. In respect of representations questioning the utility of wind turbines to meet demands for power, paragraph 4.9 of the proposed plan explains that onshore wind is just one component of the mix of renewable energy sources that will be needed. However, paragraph 182 of Scottish Planning Policy and paragraph 146 of National Planning Framework 2 both state that hydroelectric and onshore wind power are expected to continue to be the main sources of renewable energy supplies. Section 3.2 of the Routemap for Renewable Energy in Scotland states that "onshore wind turbines can make a very large contribution to the progress to Scotland's renewable electricity target". Given this national policy context I conclude that it is appropriate for the strategic development plan to refer to the potential of onshore wind; indeed it would have been remiss for it not to have done so.

20. The representation from Mr Hales raises important points about the ongoing use of sites currently used for renewable power generation, and their associated electricity connections. The approach taken to how these sites and assets will be used in the future may have strategic implications that could appropriately be covered in the strategic development plan. However, on balance I agree with the authority that, given the number

of years that will elapse before decisions have to be made about the reuse of the majority of these sites, it is not necessary to address this in this iteration of the plan.

21. Scottish Natural Heritage seeks the inclusion of a reference to the protection of sensitive areas (such as special protection areas) from the potential harmful effects of some wind turbine proposals. I agree with the authority that the plan needs to be read as a whole, and that sufficient reference is made to the need to protect these sites elsewhere in the document. For instance the Quality of the environment section requires both councils to take account of biodiversity, wildlife habitats and other sensitive areas in assessing development proposals. Paragraph 5.6 (as recommended to be modified by this report) notes that certain developments will be subject to satisfactory demonstration of no negative effect on the integrity of any Natura 2000 site. I therefore conclude that no further reference is required to the protection of sensitive areas in this part of the plan.

22. National Power Consultants proposes inserting additional text into the second bullet under How to meet the targets to state that the areas that local development plans are to identify for the supply of renewable energy must be areas for development and include preferred areas. In my view it can reasonably be inferred from the existing text of the proposed plan that the areas to be identified are those that are considered to have a reasonable potential for development. Therefore I conclude that no change to the plan is necessary. In reaching this conclusion I am also conscious that this part of the plan has been rolled forward from the existing approved structure plan without change.

Carbon Capture and Storage

23. From the evidence submitted it is clear that carbon capture and storage is an emerging technology. A level of uncertainty remains about the best way to store carbon dioxide and the ultimate viability of the approach. But equally, if carbon capture and storage can be employed successfully, it may be of great importance in tackling climate change. It is the potential of this technology that the proposed plan emphasises at paragraph 4.10, along with the role of Peterhead Power Station as a demonstration project.

24. In my view it is wise for the plan to acknowledge and accommodate prospects for this technology, especially given the particular potential of North East Scotland for its roll-out. In establishing whether an emerging technology has long term or wider applicability, it is sensible to firstly pursue one or more demonstration projects. This is what appears to be envisaged at Peterhead.

25. Paragraph 70 of National Planning Framework 2 identifies that significant reductions in CO₂ emissions can be achieved through the development of carbon capture and storage technologies. Paragraph 152 specifically mentions Peterhead as a potential location for such a project. Given that the strategic development plan is legally required to take account of the National Planning Framework, I consider it would have been remiss for the plan not to have referred to the potential use of this technology at Peterhead.

26. Overall I conclude that no modification to the plan is required.

Transport Emissions

27. Paragraph 165 of Scottish Planning Policy states that the planning system should

support the installation of infrastructure to support new technologies, such as charging points for electric vehicles. This is not a requirement on developers to install this equipment, but a call for the planning system to facilitate any such proposals. The reference in paragraph 4.8 of the proposed plan to electric-vehicle charging points is given as an example of what can be done to encourage the use of alternative fuels. This matter is not covered among the targets for sustainable development and climate change on page 31 of the plan or in the How to meet the targets section. For these reasons, I do not interpret the plan as containing a direct requirement on developers to provide such charging points. The text in the proposed plan is therefore in line with national policy on this matter, and I conclude that the wording in the plan is appropriate. It is beyond the scope of this examination to make conclusions on the practical efficacy of electric cars.

28. Regarding whether this part of the plan should refer to modal shift to active travel, I agree with the authority that the plan needs to be read as a whole. Paragraph 4.8, within the Sustainable development and climate change section of the plan, already contains a high-level reference to reducing the effects of transport on climate change. However most detail on this subject is contained in the Accessibility section at pages 38 and 39. This deals extensively with the need for new development to reduce the need to travel and encourage more environmentally-friendly forms of transport. I believe the Accessibility section is the most natural place to address transport matters, and therefore conclude that the existing high level reference at paragraph 4.8 is sufficient and no modification to the plan is required.

Renewable Heat

29. Renewable heat has a particular status as being a form of renewable energy that does not involve power generation and one that is subject to its own national target (for 11% of heat demand to be met from renewable sources by 2020). Both National Planning Framework 2 and Scottish Planning Policy make frequent mention of the potential of renewable heat. National Planning Framework 2 consistently refers separately to the power and heating aspects of renewable energy. For instance, paragraph 53 identifies facilitating the generation of power and heat from all clean low carbon sources as one of the main elements of the Framework's spatial strategy. Paragraph 184 of Scottish Planning Policy calls on development plans to support all scales of development associated with the generation of energy and heat from renewable sources.

30. Paragraph 4.9 of the proposed plan deals with renewable energy, and is also the part of the plan where one would expect to find references to renewable heat. Indeed certain renewable heat technologies are listed in this paragraph as examples of renewable energy sources. Combined heat and power schemes are also mentioned in paragraph 4.7 and in the How to meet the targets section. The use of surplus heat from energy from waste facilities is covered in paragraph 4.16. The plan therefore gives a number of examples of renewable heat technologies, and beyond these references, I agree with the authority that it is not necessary to list each particular technology unless they are associated with particular land use issues. However the plan does not make clear the fundamental point that renewable energy may comprise either power generation or the use of heat. I therefore recommend a minor modification to clarify that it is both more heat and more power that will need to be supplied from renewable sources.

31. The Climate Change (Scotland) Act is already referred to at paragraph 1.15 as an influence on the proposed plan. Adding further references to the Act and to the

Renewable Heat Incentive would provide more background to the renewable energy issue, but is not necessary in terms of the practical effect of the plan.

Waste

32. A number of discrete concerns have been raised regarding the proposed plan's coverage of planning for waste. Firstly regarding the target to work towards an extra 300,000 tonnes of new waste management infrastructure, it is separately argued that this should not be seen as a limit, and that including any target figure is unhelpful. The 300,000 tonne figure is derived from Annex B to the Zero Waste Plan, and no alternative figure has been suggested. The Scottish Environment Protection Agency support the identification of a capacity target while noting this should not be a cap. I consider that it is helpful to give users of the plan, including those preparing local development plans, an indication of the scale of new infrastructure that may be required. I therefore conclude that the 300,000 tonne figure should be retained.

33. There is arguably an inconsistency between paragraph 4.15 of the proposed plan, which states that a capacity of over 300,000 tonnes will be required, and the relevant target on page 31, which refers to working towards an extra 300,000 tonnes. The representation from the Scottish Environment Protection Agency confirms that the capacities shown in Annex B of the Zero Waste Plan should not be treated as a limit. I therefore conclude that the target on page 31 of the plan needs to be adjusted to clarify that the 300,000 figure is a minimum. This will bring the target in line with the intentions of the Zero Waste Plan and make the plan more internally consistent.

34. The Scottish Environment Protection Agency suggests that the statements in paragraph 4.16 of the proposed plan regarding the integration of waste management into development and the management of construction and demolition waste should be expressed as requirements for local development plans and supplementary guidance in the How to meet the targets section. It is argued this would enhance the plan and tie it more clearly to a related action in the proposed action programme.

35. Paragraph 4.16 is not explicit that its provisions regarding the integration of waste management and the consideration of construction and demolition waste are to apply to local development plans or supplementary guidance. However the plan is to be read as a whole and I consider that the legal requirement for local development plans to be consistent with the strategic development plan would apply to paragraph 4.16 as much as to any other part of the plan. Given this, there is little to be gained from repeating the text from paragraph 4.16 elsewhere in the plan. I am also mindful that this part of the How to meet the targets section has been rolled forward from the existing approved plan without change, and that there have been no clear changes in circumstance. Overall I conclude that no modification is required.

36. The proposed plan is criticised for being passively reactive in regard to waste. However, the plan identifies a target for new waste management infrastructure and gives spatial guidance as to where new waste management facilities are to be located. In my view this represents a reasonably positive policy framework, and no modification to the plan is required.

37. It is suggested that the language of the plan should move from 'waste management' to 'resource capture and utilisation'. While it can be helpful to think of waste as a useful resource, I consider that waste management is likely to be a term more readily

understood by most people. I note that the relevant section in Scottish Planning Policy is entitled waste management. The plan contains several references to potential beneficial uses for waste such as for composting and for generating energy and heat, so the user of the plan should not get the impression that the authority sees waste only as a problem. Overall I conclude that the terminology used in the plan is appropriate.

38. It is argued that the plan should refer to the possible need to import waste as feedstock to ensure the financial viability of new facilities. Annex B to the Zero Waste Plan indicates that cross-boundary waste shipment may sometimes be necessary. For instance, particular facilities for the handling of particular kinds of waste may appropriately have a larger catchment than the Aberdeen city region. However such proposals would not be in conflict with the text of the proposed plan because, at least for those facilities within the strategic growth areas, the plan does not attempt to control the origin of the waste that is to be treated. Paragraph 5.4 of Annex B to the Zero Waste Plan sets out the Scottish Government's expectations for strategic development plans with regard to waste. It does not indicate that commentary on the geographical origin of waste should be included. I therefore conclude that the plan is sufficient in this regard and no change is required.

39. Regarding whether the plan should refer more fully to non-municipal waste, I do not interpret the text of the proposed plan as being restricted to municipal waste. The authority has stated that the 300,000 tonne target for new waste management infrastructure relates to all waste. The reference to the work of the two councils to identify residual waste management solutions could refer as much to policies to govern the handling of applications for non-municipal waste facilities as to their strategies for handling municipal waste. I am also mindful that this part of the How to meet the targets section has been rolled forward from the existing approved plan without change, and no clear changes in circumstances have been pointed out to me. Overall I conclude that no modification is required.

40. The proposed plan's approach of directing most waste treatment facilities to those parts of the strategic growth areas closest to Aberdeen should ensure that new facilities are well-related to strategic transport routes and close to the biggest concentrations of population and economic activity. The approach is therefore in line with the proximity principle, which is defined in paragraph 213 of Scottish Planning Policy as requiring waste to be dealt with as close as possible to where it is produced. Nor is it in conflict with the statement in the Zero Waste Plan that indicates that waste may need to cross planning boundaries. I acknowledge that there may always be project-specific factors that may justify locations outwith the preferred locations. This is recognised in the plan, which only aims for 'around 75%' of facilities to be in the preferred areas. While facilities outwith these areas are 'generally' to meet a more local need or need to be in a rural location, this wording allows for exceptions to be made if appropriately justified. I conclude that no modification to the plan is required.

41. It is suggested that the plan should seek to identify further landfill sites in recognition that the targets to reduce the amount of waste going to landfill may not be achieved. The authority points to its monitoring statement which indicates that in 2009 around 5.3 million tonnes of landfill capacity existed, with a possible further 5.6 million tonnes coming on-stream. Its evidence is that the rolling 10-year landfill capacity requirement is now 3.8 million tonnes. On the basis of this evidence I conclude that sufficient capacity exists and the plan does not need to make specific provision for further landfill sites. The authority can keep this matter under review and reconsider the need for further landfill capacity at

the time of the next plan review.

Flooding

42. Firstly I note that the parts of the proposed plan that deal with flooding are largely rolled forward from the existing approved structure plan. No particular changes in circumstance since the approval of that plan have been brought to my attention.

43. Regarding the potential impact of rising sea levels on river flooding, paragraph 4.11 of the proposed plan acknowledges that the impact of rising sea levels will need to be taken into account when considering what type of development should be built in which locations. The How to meet the targets section requires local development plans to avoid identifying sites for development which are at an unacceptable risk of flooding. Overall I conclude that this matter is adequately covered in the plan.

44. There may be opportunities for managed coastal realignment within the plan area, and paragraph 103 of Scottish Planning Policy does state that “where relevant, development plans should ... identify areas where managed realignment of the coast may be appropriate”. However no particular such opportunities have been brought to my attention. Nor does Scottish Planning Policy state that this is necessarily a role for strategic development plans. This is not a matter that is identified in paragraph 41 of Circular 6/2013 as being a likely principal topic for strategic development plans. In my view it would only be likely to be necessary to cover this topic in this plan if there was a particular opportunity for such a proposal, and it had cross-boundary implications. As this does not appear to be the case, I conclude that no modification is required.

45. It is suggested that the Targets section of the plan should specifically mention brownfield sites with appropriate flood prevention measures in place as the only exceptional circumstance where development on land at risk of flooding may be accepted. It is clear from the risk framework contained in Scottish Planning Policy that there are a number of types of development that may be acceptable in high flood risk areas. These may include, for instance, developments essential for operational reasons, recreation and sport related developments and caravan and camping sites. I therefore conclude that the suggested modification to the plan is not appropriate.

Water Efficiency

46. The issue of water extraction from the River Dee is clearly a significant one, as reflected in paragraph 4.17 and in other references in the proposed plan. Scottish Natural Heritage seeks a number of changes to the plan aimed at safeguarding the river’s status as a special area of conservation. The first of these relates to the third target on page 31 of the plan. This currently refers to avoiding any increase in the amount of water that Scottish Water is licensed to take from the river. Scottish Natural Heritage suggests it should instead refer to avoiding a negative effect on the special area of conservation.

47. Firstly I note that this target has been rolled forward from the existing structure plan, and it is not clear that circumstances have changed significantly since then. Adverse effects on the integrity of the River Dee Special Area of Conservation are to be avoided unless there are no alternative solutions and there are imperative reasons of overriding public interest. No party has sought to justify an adverse effect in these terms. The Habitats Regulations Appraisal Record which accompanies the proposed plan did identify the potential for significant effects, but set out how these could be mitigated. Mitigation

measures included agreeing with relevant bodies to ensure that water extracted will not affect qualifying features. There is therefore an acknowledgement that water extraction arising from development identified in the plan should be limited to such a level as to avoid a significant adverse effect. Other measures in the plan relating to water conservation will contribute to achieving this.

48. In responses to further information requests, the authority and Scottish Natural Heritage have pointed to an agreement reached between them that the inclusion of an appropriate cross-reference in the plan to mitigation measures contained in the Habitats Regulations Assessment would (along with other changes relating to water extraction and water efficiency discussed below) be sufficient to resolve this matter. This approach is less than ideal because: the Habitats Regulation Appraisal does not form a part of the development plan; the plan would be less easily understood as a stand-alone document; and paragraph 8 of Habitats Regulations Appraisal Advice Sheet 2 specifically states that, “as a general rule ... ‘qualifications’ should be included in the plan and not just in the HRA record”. However, in this case the concerned parties are content with this approach, and, as noted above, this part of the plan has been rolled forward from the existing plan. I also note that Advice Sheet 2 only refers to ‘a general rule’, with the implication that exceptions are possible. I am therefore content in this case for the mitigation measures to be set out in the Habitats Regulation Appraisal and the appropriate cross reference to be included in the plan. I recommend a suitable modification to paragraph 5.6 of the plan.

49. Scottish Natural Heritage also sought the insertion of an additional bullet point under How to meet the targets relating to the Scottish Environment Protection Agency’s licensing of water extraction from the River Dee. The responses to the further information requests indicate that the authority and Scottish Natural Heritage have agreed that an amendment to paragraph 4.17 would be acceptable to both parties and sufficient to resolve this matter. Extraction licences are not principally matters for the land use planning system. However, in this case a reference to the possible need to reconsider the amount of water that can be extracted from the River Dee in the future is useful. Along with the other modifications discussed under this issue it would allow Scottish Natural Heritage to accept the conclusion of the Habitats Regulation Appraisal that the plan would not be likely to have a significant effect on a European site. I therefore conclude that the plan be modified using the form of words suggested by the authority.

50. Thirdly, Scottish Natural Heritage seeks the insertion of an additional bullet point under ‘How to meet the targets’ regarding the promotion of water efficiency and water saving measures in new developments. The authority’s response states that this change would be acceptable to them. It also acknowledges that local development plans will have to address this issue and notes that a related action was contained in the existing structure plan. Given that a target relating to water-saving technology already exists, and the particular importance of limiting the need to extract water from the River Dee, I am satisfied that a modification as suggested by Scottish Natural Heritage would be appropriate. I limit this to ‘relevant’ new developments because not all development creates an additional demand for water.

51. Finally, Scottish Natural Heritage suggests adding a reference to the preparation of a water shortage plan. I note that the Habitats Regulation Appraisal Record identifies the preparation of “a drought plan as an adaptation to future climate impacts” as a mitigation measure to avoid significant impacts on a number of European sites including the River

Dee Special Area of Conservation. From the responses to the further information requests mentioned above, I gather that Scottish Natural Heritage is content to regard this matter also as resolved, provided the cross reference to mitigation in the Habitats Regulations Appraisal is included in the plan. On this basis I conclude that no reference to a water shortage plan requires to be included in the strategic development plan.

52. Stewart Milne Homes opposes the target relating to water-saving technology. As discussed above, there are particular reasons, relating to the River Dee, why water conservation is a particularly important issue in Aberdeen City and Shire. Building regulations may not be as sensitive to these regional considerations as the planning system. Paragraph 39 of Scottish Planning Policy also states that decisions on new development should promote the efficient use of infrastructure and support sustainable water management. I therefore conclude that no modification to the plan is required. In reaching this conclusion I am also mindful of the desirability of not modifying wording that has been rolled forward from the existing approved plan unless circumstances have clearly changed.

Identification and safeguarding of pipeline corridors

53. I consider the safeguarding of land around existing pipelines to be more likely to be an issue for local development plans to address, due to the site-specific nature of the safeguard required and the absence of obvious cross-boundary implications. I note that paragraph 41 of Circular 6/2013 does not identify this as an expected topic for strategic development plans. I conclude that no modification to the plan is required.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In the second sentence of paragraph 4.9, replace "energy" with "heat and power".
2. Amend the final sentence of paragraph 4.17 to read: "*During and beyond the period of this plan the effects of climate change may affect the river and appropriate adaptation measures may have to be taken by a range of organisations. This could include measures such as reducing the amount of water Scottish Water are licensed to take from the River Dee.*"
3. Amend the second target on page 31 of the plan to read: "*For the equivalent of the city region's electricity needs to be met from renewable sources by 2020.*"
4. Amend the sixth target on page 31 of the plan to read: "*To work towards at least an extra 300,000 tonnes of new waste-management infrastructure.*"
5. Add an additional bullet point after the third existing bullet point under How to meet the targets on page 31 of the plan to read: "*Local development plans (and supplementary guidance) will promote water efficiency and water saving measures in all relevant developments.*"
6. Add additional sentence at the end of paragraph 5.6 to read: "*The Habitats Regulations Appraisal of this plan contains safeguards which will need to be applied at that stage.*"

Issue 5	Scale of Growth	
Development plan reference:	Chapter 3, Spatial Strategy page 8 - 23 Chapter 4, Objectives, page 24 - 38 Schedule 1: Housing allowances page 42	Reporter: Scott Ferrie
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> Sigma Capital Group Ltd (PP026a) Scotia Homes (PP104f)</p> <p><u>Housing Need and Demand Assessment</u> Kirkwood Homes Ltd (PP097c) Scotia Homes (PP134c) Polmuir Properties (Newtonhill) Ltd (PP138a) Case Consulting Ltd (PP167a) NHS Grampian (PP213e) Byron McKibben (PP225a)</p> <p><u>Population growth target</u> Portlethen & District Community Council (PP085) Stewart Milne Homes (PP122) NHS Grampian (PP213f) North Kincardine Rural Community Council (PP224f) Homes for Scotland (PP230) Bancon Developments Ltd (PP241)</p> <p><u>Housing Requirement</u> Graham Homes Ltd (PP033) Sandlaw Farming Ltd (PP038) Portlethen & District Community Council (PP087b) Elsick Development Co (PP101b) Scotia Homes Ltd (PP104g, PP134d) Stewart Milne Homes (PP122a) Polmuir Properties (Newtonhill) Ltd (PP138b) Homes for Scotland (PP144a) Dunecht Estates (PP145) Taylor Wimpey/Mitchell Partnership (PP178, PP179a) Scottish Enterprise (PP186b) Homes for Scotland (PP230, PP235) Bancon Developments Ltd (PP242b) Bancon Developments Ltd (PP244) Aberdeen & Grampian Chamber of Commerce (PP248f)</p> <p><u>Generous supply of housing land</u> Colin & Esther Tawse (PP042) Portlethen & District Community Council (PP087a) Elsick Development Co (PP101a) Stewart Milne Homes (PP122c) Scotia Homes (PP134e)</p>		

<p>Polmuir Properties (Newtonhill) Ltd (PP138c) Homes for Scotland (PP144b, PP231, 232c) Taylor Wimpey/Mitchell Partnership (PP179b, PP180) Kincluny Development Trust (PP185) Scottish Enterprise (PP186a) Barratt East Scotland/Drum Development Co (Stonehaven) Ltd (PP191a, PP192a, PPP192b) John McIntosh (PP195a, PP196a) Drum Property Group Ltd (PP203) CastleGlen Land Search Ltd (PP212c) North Kincardine Rural Community Council (PP224g) North Kincardine Rural Community Council (PP224h) Bancon Developments Ltd (PP242a)</p> <p><u>Balance of allowances between Housing Market Areas</u> Kirkwood Homes Ltd (PP097b) Barratt East Scotland/Drum Development Co (Stonehaven) Ltd (PP191b, PP193b) Stewart Milne Homes (PP116b) John McIntosh (PP195b, PP196c) Homes for Scotland (PP232b) Bancon Developments Ltd (PP244d) Bancon Developments Ltd (PP245a) Sandlaw Farming Ltd (PP036) Westhill Development (Arnhall) Ltd (PP046a) Stewart Milne Homes (PP112b)</p> <p><u>Balance of allowances between Aberdeen City and Aberdeenshire</u> Westhill Development (Arnhall) Ltd (PP046c) Stewart Milne Homes (PP116a) Nicola Hutcheon (PP126) Scotia Homes (PP133b) Homes for Scotland (PP232a) North Kincardine Rural Community Council (PP224b)</p>	
<p>Provision of the development plan to which the issue relates:</p>	<p>Chapter 3, Spatial Strategy page 8 - 23 Chapter 4, Objectives, page 24 - 38 Schedule 1: Housing allowances page 42</p>
<p>Planning authority's summary of the representation(s):</p>	
<p><u>Support</u></p> <p>PP026a – Support the growth ambitions of the SDP and the need to increase the number of homes built on an annual basis.</p> <p>PP104f – Support the objective and house building target for 2016 – 2020.</p> <p><u>Housing Need and Demand Assessment</u></p> <p>PP097c – The Housing Need and Demand Assessment (2011) needs to be updated given the improved economic situation since then.</p>	

PP134c, PP138a – There is concern that the Housing Needs and Demand Assessment underpinning the suggested population growth is not based on up to date statistics, including the National Records of Scotland (NRS) forecasts, which project higher growth between 2011 – 2035.

PP167a – The HNDA is fundamentally flawed and does not provide a reasonable basis for forward planning.

PP213e – The HNDA on which the SDP is based is now 2 years out of date and requires to be reviewed in light of the NRS projections. Whilst the population and household projections (and the housing requirement that flows from them) must be realistic, they must also be sufficiently robust to provide confidence and certainty.

PP225a – The boundaries of the Aberdeen Housing Market Area must be brought up-to-date.

Population growth target

PP085 – The plan is far too pro development and should be amended to reflect its function of enabling growth to address demand, rather than promoting growth.

PP122 – The Proposed SDP falls significantly short of providing the strategic context required to accommodate the growth assumptions for the population in the area. As result the number of house completions and housing allocations is too low and compromises the economic growth of the area.

PP213f – Population projections published by the National Records of Scotland (NRS) highlight a significantly greater population increase and consequently, housing requirement. Principle population growth of 57,000 (refer to SupRep/Doc6 for detail of representation and to SupSDP/Doc16 for figures). In terms of household growth the projections within the NRS report are significantly higher between the period of 2010 and 2035 (at 73,180) than the figures shown in Figure 10 of the Plan (CC/Doc1). This anomaly is a concern to NHS Grampian as it could have serious implications for the planning and delivery of the care services and facilities.

PP224f – Population growth cannot be a matter of policy. To recognise it as a trend and allow for it is welcomed but to suggest that an increase of 35,000 is planned (para 4.20) is dangerous.

PP230, PP241 – The target for population growth is too low and will constrain development opportunities.

Housing Requirement

PP033, PP038, PP104g, PP134d, PP144a, PP145 – The population targets and housing requirements set by the plan are too low, failing to reflect the most recent National Registers of Scotland projections. They need to be increased, along proportionately with the allowances in Schedule 1.

PP087 – The 2011 Census indicates a higher population than para 4.19 (475,800 rather than 465,000). The housing requirement should therefore be considerably lower.

PP101b – It is unclear how the target to build at least 2,500 homes per year by 2016 and 3,000 by 2020 sit with the reduced allowances in Schedule 1 or reduced requirement in Figure 10?

PP122a, PP178, PP179a – The proposed plan falls significantly short of providing the strategic context required to accommodate a best-case growth assumption, with a requirement of between 72,070 and 85,770 new homes.

PP186b – It is important that the Strategic Development Plan provides the framework and guidance for Local Development Plans to deliver new housing timeously in the locations and quantity required. We are concerned that there is a reduced ambition for growth set out in the Strategic Development Plan. The reduced aspirations and extended timescales for the provision of housing in the Strategic Development Plan is not supportive of the Strategic Development Plan vision and could jeopardise the plan's objectives for population and economic growth at a time when the economy of the north east is one of the fastest growing areas in the United Kingdom.

PP230, PP235, PP248f – The plan allows for 54,000 units but this would appear to be insufficient based on population growth expectations. Failure to plan for actual growth could act as a constraint on economic growth.

Generous Supply of Housing Land

PP042, PP232a – Housing sites need to be deliverable within the plan period they are allocated for with flexibility to bring other sites forward where this is not the case.

PP087a – The total housing allowances are excessive and are an over-supply when compared to the requirement. Difficult sites will be left undeveloped.

PP101a, PP212c – It is disappointing that the SDP maintains the housing allocations while extending the time period by five years, in effect not proposing any additional housing in this period.

PP134e – Concern at the weight attached to brownfield sites and several large greenfield sites in the City to deliver the 5 year supply.

PP144b – Additional housing allowances are required to deliver an effective land supply on the basis of a higher housing requirement.

PP167b – The spatial strategy is fundamentally flawed and is incapable of delivering a generous supply of effective housing land in the Shire and where demand exists. The reduction in the housing land requirement in the Shire part of the AHMA is offset by a further increase in the RHMA requirement. The spatial strategy is simply incapable of delivering effective land at the level proposed because the market demand simply does not exist in the RHMA locations identified in the Strategic Growth Areas. The housing requirement is heavily weighted to limit development in the Shire part of the AHMA. This is detrimental to the economic wellbeing of the Shire.

PP179b – To ensure deliverability, housing allowances should be 25% higher than the revised housing requirement.

PP185 – There is a dependence on large sites in the Aberdeen Housing Market Area leading to an inability to be flexible and look for alternatives for delivery. Setting annual construction targets does not reflect market circumstances.

PP186a – More emphasis needs to be placed on site deliverability and the important contribution that small sites with lower infrastructure requirements can play.

PP191a, PP195a – The proposed SDP starts from a fundamental premise that there is enough land zoned and enough housing will as a consequence result.

PP192a, PP196a – There should be a much clearer policy about what is required in terms of ‘sufficient and appropriate’. It is not just a matter of matching numbers. Less constrained sites should be identified which can be progressed immediately.

PP192b – The SDP has to set out a clearer policy about dealing with non-effective and constrained sites. This policy should not just consider ‘draw down mechanisms’ but also Action Planning and Utility/Key Agency sign-up to the SDP strategy. The SDP shall be obliged to secure a protocol with Key Agencies and Utilities and their capital programmes should be material considerations in planning decisions.

PP203 - The SDP should ensure that the LDPs do not rely on large allocations where it is clear that the delivery of these within the timeframe of the LDP is doubtful or limited and should allocate a wider range of small and medium size sites to ensure delivery of housing to meet the housing requirement. Larger sites are useful in meeting medium to long-term housing needs.

PP224g - Para 4.24 (*‘we cannot expect all the new homes to be built within the relevant plan period’*) is unclear. Is it a reference to the 54,000 houses needed (Fig. 10) or to the 67,500 allocated (Schedule 1)? If it refers to the 54,000 then the phrasing is poor. To allow a ‘flexibility factor’ of 25% (i.e. the 67,500) over the needed figure does not... *‘as a result..’* mean that... *‘we cannot expect all the new homes to be built..’* The paragraph needs to be clarified.

PP224h – The housing allowance of 67,500 appears very ambitious and perilously high (although the reduction from 72,000 to 67,500 is welcomed). Our caution stems not only from the extra impetus given to the figures by unpredictable population growth, but from the very real possibility of partially-completed developments (with either infrastructure or housing incomplete) should the economic climate and outlook remain uncertain, and also from the finance difficulties frankly admitted by the Plan in Paras 4.21 and 4.27. That potential danger – of either large or small part-finished developments - could do immense damage to the SDPA’s admirable vision of making the region an attractive place to live, improving the quality of life etc. The greater weight given to the Shire’s share of the total housing numbers in this plan (by comparison with the 50/50 split in the Structure Plan) is welcomed as being realistic by recognising the long-standing trend and accommodating it. The plan follows too slavishly the Scottish Planning Policy’s vaguely-phrased injunction in favour of *‘identifying a generous supply of land.’*

PP231 – Regeneration is still a priority for the strategy and Aberdeen City Council is developing a new framework. The 5,000 homes removed from Schedule 1 in the current structure plan should be reinstated.

Balance of allowances between Housing Market Areas

PP036, PP046a – There should be a greater proportion of housing allocated to the Aberdeen Housing market Area where demand is high.

PP097b – Concern that the average annual housing requirement has gone down in the Aberdeen Housing Market Area but up in the Rural Housing Market Area since the last structure plan.

PP112b, PP116b, PP191b, PP193b, PP195b, PP196c, PP232b, PP244d, PP245a – There is an imbalance of allocations towards the Rural Housing Market Area rather than the Aberdeen Housing Market Area. The Rural Housing Market Area is not well related to the employment and cultural opportunities in and around Aberdeen and not connected to public transport which mean the sustainability criteria set out in Scottish Planning Policy are not being met and this does not reflect recent sustainable trends.

Balance of allowances between Aberdeen City and Aberdeenshire

PP046c, PP116a, PP126 – The Proposed Plan aims to commit to sustainable development however, the Spatial Strategy is indeed the converse of this. The Plan sets a target of 50% of new housing in Aberdeen but the Schedule on Page 42 only allows for 47% of development to be in the City.

PP133b, PP232a – It is noted that the Plan sets a target of over 50% of new housing development being in Aberdeen (paragraph 3.6). However, Schedule 1 restricts this to 47.6%. The deficit of 2.4% should be reallocated to the City on greenfield land. This would be supported by the current positive economic climate and opportunities created by infrastructure development.

PP224b – It is unclear how the 50% target for housing development in each council area relates to Schedule 1 given that the split in allowances is now no longer 50/50.

Modifications sought by those submitting representations:

Support

PP026a, PP104f – None sought (Supportive)

Housing Need and Demand Assessment

PP097c – The HNDA needs to be updated to inform and support the SDP strategy.

PP138a, PP213e – None suggested

PP167a – A thorough examination of the HNDA is required to determine why the conclusions in terms of the housing requirements are so completely implausible. That should then require a revision to the HNDA to provide a genuine assessment of the housing requirements without the imposition of any predetermined and underlying policy objective.

PP225a – The boundaries of the Aberdeen Housing Market Area must be brought up-to-date, using the 2007 DTZ study if necessary.

Population growth target

PP085 – Amend the objective to “enable growth of the city region to achieve a balanced age range” Delete reference to “aiming for population growth in para 4.212. Delete target “to increase the population of the city region”.

PP122 – Use the National Records of Scotland 2010 for baseline data for the SDP. Amend Schedule 1 to take account of the increased need for housing (see table attached 13-document Revised proposals for Schedule 1) and increase the housing completion targets to at least 3,750 homes per annum.

PP213f, PP224f – None specified.

PPP230, PP241 – Increase the targets in line with National Records of Scotland projections.

Housing Requirement

PP033, PP038, PP145 – The population figures and targets should be amended to reflect the NRS principal projection. Similarly, the housing requirement set out in Figure 10 requires to be increased from 53,972 units to 70,375 units to reflect the principal household projection set out by the NRS. This also requires a similar proportionate increase in the housing allowances set out in Schedule 1. The overall allowance should be increased from 67,500 units to 88,000 units with the increased allocation being distributed proportionately (PP038) or throughout the Aberdeen Housing Market Area within the Strategic Growth Areas and Local Growth and Diversification Areas (PP033 and PP145). The targets set out on Page 33 also require to be amended to reflect the NRS population projections and the projected housing requirement.

PP087b – Figure 10 should be amended to reflect the higher base population indicated by the census.

PP101b – None specified

PP134d, PP104g – the National Records of Scotland projections should replace Figure 10 in the Proposed SDP and a further 19,000 houses planned over the plan period in Schedule 1.

PP144a – The SDP sets a requirement of between 1,007 and 1,638 homes too few to achieve the vision it sets out. Three alternative figures for Figure 10 are provided which would take the requirement up to 85,770 over the plan period.

PP178, PP179a – SDP should plan for best case growth assumption of up to 85,770 homes.

PP186b – If the timescales for new housing allowances are to be put back, the allowances should be increased to compensate for this to retain the high aspirations for growth.

PP230 – none specified

PP248f – The SDPA should review its housing development targets.

Generous Supply of Housing Land

PP042 – An additional paragraph is inserted after para 3.5 highlighting the importance of local development plans allocating, particularly in SGA's, sites that are capable of being delivered within the plan period they are allocated to. Mention should also be made that if sites are not coming forward, then an effective mechanism requires to be in place to allow later phase sites or parts of sites to be brought forward.

PP087a – Schedule 1 should be recalculated to reflect a much lower level of flexibility (20%) over the requirement. Allowances would be around 44,300.

PP101a – Increase the allowances for the period 2027 – 2035 in Schedule 1.

PP134 – There should be a policy preference for small greenfield sites.

PP144b, PP179b – A 25% uplift is required on top of the amended higher housing requirement to ensure an effective 5-year land supply can be delivered. This will raise allowances to between 75,000 and 107,000.

PP167b – The spatial strategy requires to be reviewed and modified to accommodate the actual housing requirements within the Shire with a clear and genuine commitment to distribute the requirement in a manner that is most likely to deliver effective housing allocations where demand exists. Inevitably there will be a need to considerably increase the allowances in the local growth areas in both the AHMA and the RHMA.

PP185, PP191a, PP192a, PP195a, PP196a – The SDP should contain a policy associated with the housing allowances which not only requires that appropriate and sufficient land is allocated to meet these allowances; but also that 'appropriate and sufficient' shall be defined as follows:

'Appropriate and sufficient shall mean more than simply matching the numbers required, and shall include:

- sufficient allocations to ensure that delivery occurs
- sufficient sites allocated to ensure that competent 'draw down mechanisms' will work in the event that other sites are delayed or become constrained and this should simply apply LDP wide but in sub-market areas as well
- Appropriate liaison has taken place with Key Agencies and utility providers to determine that sites stand a chance of becoming effective during the plan period.
- Appropriate action will be set out in the LDP action that has a realistic expectation that it can be achieved and lead to sites becoming effective.

PP186a – More emphasis needs to be included in the section on Population Growth under "How to meet the targets" on the importance of deliverability of sites and the important contribution for example that small sites with lower infrastructure cost and financial and development constraints can make to deliverability.

PP192b – The SDP has to set out a clearer policy about dealing with non-effective and constrained sites. This policy should not just consider 'draw down mechanisms' but also Action Planning and Utility/Key Agency sign-up to the SDP strategy.

PP203 - The SDP should contain a policy associated with the Housing Allowances which not only requires that appropriate and sufficient land is allocated to meet these

allowances; BUT also that “appropriate and sufficient” shall be defined as follows:

‘Appropriate and sufficient’ shall mean more than simply matching the numbers required

- and shall include

- sufficient allocations to ensure that delivery occurs
- sufficient sites allocated to ensure that competent ‘draw down mechanisms’ will work in the event that other sites are delayed or become constrained and this should not simply apply LDP plan wide but in sub-market areas as well
- appropriate liaison has taken place with key agencies and utility providers to determine that sites stand a chance of becoming effective during the plan period
- appropriate action will be set out in the LDP action that has a realistic expectation that it can be achieved and lead to sites becoming effective
- a range of sizes and location of housing sites should be allocated, especially small and medium scale sites to deliver much needed housing in the short term (and catch up on the latent demand created by under-delivering over the last few years).

PP212c - Revert to the Structure Plan allowances and plan periods with an additional phase of land between 2030 and 2035

PP224g - Para 4.24 needs to be clarified.

PP224h – The housing allowance of 67,500 should be reduced.

PP231 –The 5,000 homes removed from Schedule 1 in the current structure plan should be reinstated.

Balance of allowances between Housing Market Areas

PP036, PP046a – A greater proportion of the housing allowances in the Local Growth and Diversification Areas should be directed to the Aberdeen Housing Market Area.

PP097b – none suggested

PP112b, PP116b, PP191b, PP193b, PP195b, PP196c, PP232b, PP244d, PP245a – Redistribute some (or at least 50%) of the RHMA allocations to the Aberdeen Housing Market Area (AHMA).

Balance of allowances between Aberdeen City and Aberdeenshire

PP116a, PP126 – Ensure Schedule 1 shows at least 50% of the housing being in Aberdeen City.

PP133b, PP232a – Housing allowances in Aberdeen City should be increased to ensure they match the target (target 2 on p8 of the plan) of 50% of new homes across the plan area to be in Aberdeen City.

PP224b – None specified

Summary of responses (including reasons) by planning authority:

Support

PP026a, PP104f – Support welcome

Housing Need and Demand Assessment

PP097c, PP134c, PP138a, PP167a, PP213e, PP225a - The Housing Need and Demand Assessment (HNDA) is the common evidence based required by Scottish Planning Policy to inform the preparation of development plans and local housing strategies (CC/Doc11, para 67). In line with SPP, the Aberdeen City and Shire HNDA (CC/Doc5e) was prepared at the correct time in the process (to inform the main issues report for the Strategic Development Plan and the two Local Housing Strategies). It was prepared in an open and transparent way with the participation of a wide range of stakeholders (CC/Doc5e, page 3 & 4) and covered all tenures. The HNDA was signed-off as robust and credible by the Scottish Government's Centre for Housing Market Analysis.

As also required, the HNDA was prepared at a 'functional housing market area level' and the plan itself follows the same approach.

The use of the current housing market area boundaries was agreed as part of the HNDA process (CC/Doc5e, para 1.16-1.20 and Appendix 3). Although research had been carried out in 2006/2007 to test the continuing suitability of these boundaries, it was agreed that the current boundaries continued to be a suitable basis for forward planning – particularly as the scale of change was quite minor, the benefits of data continuity are significant and the evidence for change was quite weak. Prior to the preparation of the next HNDA, the boundaries of the housing market areas will be reviewed, taking into account the results of the 2011 Census. The continued use of the current housing market area boundaries was considered at the appropriate stage in the process and it is not possible to change the boundaries at this stage in the process.

This is a plan based on meeting housing need within the two Housing Market Areas, not each council area (in line with SPP para 74). The plan is based on a strategy to focus development into the most sustainable locations and it is this strategy which determines where growth should happen within the two HMAs, not a set of demographic forecasts. There is no 'requirement' for the Aberdeenshire part of the AHMA in the plan. There is a requirement for the whole of the AHMA (Figure 10, p32) and allowances for areas within it (Schedule 2, p42), but no reduction in these allowances within the Aberdeenshire part of the AHMA when compared to the current structure plan.

There is no requirement to update the assessment prior to the publication of the proposed SDP. It is not surprising, therefore, that almost two years elapsed between the signing-off of the HNDA and the representations period for the SDP. New data is always being published and it would not be appropriate to constantly change the base information, particularly as the assessment is an important common evidence base for the LHS as well as the development plan (SPP para 67). Both local housing strategies have now been through their assessment processes, been approved by the two councils and are due to be published during June 2013. The HNDA is therefore not out-of-date (PP033, PP038, PP097c, PP145) and no evidence has been presented to justify the claim that its results are implausible (PP167). There is no justification for going back to the start of the process and preparing a new HNDA as suggested in some representations.

However, the publication of the 2010-based council area projections by the National Records of Scotland (SuppSDP/Doc16) were recognised by the Housing Market Partnership when it met in May 2012. The partnership agreed that the HNDA still provided a strong evidence base to inform the SDP and LHS (SuppSDP/Doc8, s9). The

publication of Strategic Development Plan area projections for population (July 2012 – SuppSDP/Doc16) and households (December 2012 – SuppSDP/Doc17) occurred too late to inform the Housing Market Partnership but are consistent with the projections published earlier in the year for council areas.

The HNDA will be updated to inform the Main Issues Report for the next Strategic Development Plan and will take into account the evidence available at that time, including the results of the 2011 Census.

Population growth target

PP085, PP122, PP213f, PP224f, PP230, PP241 – Population, economic prosperity, homes and facilities are all intimately linked. The aims, objectives and targets of the plan address these issues holistically and population growth is one aspect of this which it is impossible to ignore. The plan for household growth is influenced in part by expected population growth. Economic growth (and the resulting population growth) is something that the plan provides for and actively seeks).

The allowances of the plan are sufficient to enable the delivery of the house building targets as well as the housing requirement set out in the plan. The SDPA is a positive plan for the future of the area rather than a reactive plan which has no goals it seeks to achieve.

Housing Requirement

PP033, PP038, PP087b, PP101b, PP104g, PP122a, PP134d, PP138b, PP144a, PP145, PP178, PP179a, PP186b, PP230, PP235, PP242b, PP244, PP248f – Figure 10 of the plan sets out the Housing Requirement for the period to 2035 and is based on the Housing Need and Demand Assessment (2011) which was assessed as R&C by the SG CHMA in March 2011. The HNDA took the GRO(S) 2008-based population and household projections as a starting point but generated its own set of projections taking into account more local information as well as an informed view of future prospects rather than being purely trend-based and being constrained to a Scottish total (SuppSDP/Doc39). The HNDA has informed the two LHS (which have now both been adopted) as well as the proposed SDP.

Since the HNDA was published (and after consultation had concluded on the Main Issues Report), the National Records of Scotland published 2010-based population and household projections for council (February and June 2012) and SDP areas (July and December 2012).

The principal projection generated by the NRS is for an increase of 72,980 households between 2010 and 2035. Although this is higher than the housing requirement set in the proposed SDP (Figure 10 - 53,972 for 24 years rather than 25 years), the SDP provides land for 78,825 homes (77,315 plus 1,510 completions in 2010). Even the highest scenario by the National Records of Scotland is for an additional 86,630 households, and this is reduced to 78,090 when a more realistic headship rate is used which is more in line with the early outputs of the 2011 Census (SuppSDP/Doc17, s3.3 and table 13).

In any event, projections are just figures calculated on the basis of a range of different nationally determined assumptions and past trends – not an informed view of the likely demographic and household change for a particular area. The Housing Need and

Demand Assessment is the place to examine such scenarios and it would not be appropriate to impose the 2010-based projections on the plan in the way suggested in a number of representations.

The Housing Market Partnership agreed in May 2012 that the current HNDA still provided a strong evidence base for the preparation of the SDP and two LHS. The plan is robust and flexible enough to cope with higher rates of new house building than was anticipated in the HNDA if this level of need and demand arises (see below).

It is important to note that most objections completely ignore the current HNDA and don't use it to justify their opposition to the proposed plan. However, Scottish Planning Policy makes it clear that "[t]he scale, nature and distribution of the housing requirement for an area identified in the local housing strategy and development plan should be based on the outcome of the housing need and demand assessment" (CC/Doc 11 para 70). To do otherwise (by using more recently published projections) would devalue the whole HNDA process and the joint working which it is designed to foster.

Beyond year 12, the plan is only required to identify the "possible scale and location of housing land up to year 20" (para 72). There is significantly less precision about this requirement due to the timescales and uncertainties involved.

While the 2011 Census indicates a higher population than the previous National Records of Scotland estimate used to inform para 4.19, this merely indicates that the target of 500,000 (p33) could be met before 2035, not that the amount of housing required should be reduced.

A number of representations highlight reports by the Centre for Cities (Cities Outlook) and PWC (Northern Lights) to support their contention that the plan isn't ambitious enough in its strategy for growth. While both of these reports present a positive picture of the growth prospects for the local economy which is welcome, they do not suggest that the current growth strategy is unambitious. The positive outlook for the local economy presented in these reports justifies the proposed SDP's retention of its ambitious strategy for growth, in spite of the reduced housing completions over the period since 2008. What they indicate is that delivering this strategy for growth would appear to be deliverable in spite of the nationally prevailing economic climate. In relation to the PWC report, the figure of 120,000 quoted is a figure largely based on the retirement of existing staff rather than a reflection of new jobs and is in any event a UK-wide figure rather than just for Aberdeen City and Shire (SuppRep/Doc46). This indicates that training opportunities throughout the UK will be key, not trying to attract 120,000 workers to the area over the next 10 years (although it is recognised that some of the material produced by PWC would lead one to this conclusion). The Chamber of Commerce Oil and Gas Survey 2010 (SuppRep/Doc44) identifies concerns about the adequacy and affordability of housing and office space as well as facilities in local centres (p16). However, these were issues explicitly addressed in the current structure plan and proposed SDP with significant new allowances for such land and a focus on sustainable mixed communities and the city centre. The survey recognises that the housing issue in particular was addressed by the current structure plan (SuppRep/Doc44, Foreword p4).

The SDP will be reviewed on a 5-yearly cycle as required by legislation. The 2010-based projections (and subsequent versions) will inform the next HNDA and SDP. There is no need to impose them on the plan at this late stage in the plan preparation process.

Generous Supply of Housing Land

PP042, PP087a, PP101a, PP122b, PP134e PP144b, PP179b, PP185, PP191a, PP192a, PP192b, PP195a, PP196a, PP224g, PP224h, PP231, PP232c - Scottish Planning Policy (para 66) requires the allocation of a generous supply of housing land in development plans to contribute to raising the rate of new house building in Scotland. The Proposed SDP is similarly committed to increasing the rate of new house building in Aberdeen City and Shire and provides a generous supply of housing land to facilitate this.

Several representations express the view that the supply is too generous on the basis of the housing required. However, the plan is positive about growth rates which exceed the requirement and facilitates this through enhanced allowances. These are phased to avoid the potential for developers to avoid difficult development sites and avoid a general over-supply which makes infrastructure provision extremely difficult.

Objectors haven't generally criticised the lack of generosity of the supply of land on the basis of the current requirement but only on the basis of setting a higher requirement. One exception to this relates to concerns over site size which is considered below.

The way representees claim that the supply is not generous enough is by trying to add between 25% and 30% flexibility to the 2010-based projections (see above) and ignoring the current effective supply. Such an approach is inappropriate and the percentage figures are completely arbitrary.

Since 1981 (SuppSDP/Doc38), average housing completions have been 2,238pa across Aberdeen City and Shire. On only seven occasions in 32 years have completions exceeded 2,500pa and on only three of these have they exceeded 3,000pa. (1995 = 2,695; 1984 = 2,625; 1993 = 3,006; 1986 = 2,605; 1985 = 3,135; 1984 = 3,135; 1983 = 2,754). However, the plan targets moving towards housing completions of 2,500pa by 2016 and 3,000pa by 2020 (p33).

The proposed SDP provides for 77,315 new homes (67,500 allowances + 9,815 effective supply) over the 24 year period 2011-2035 (averaging 3,093p.a.). This is 43% higher than the Housing Requirement set out in Figure 10 (p32). In addition, sites can come forward from the constrained supply (4,737 units) as well as on small sites of less than five units (averaging 240pa over the last 5 years – SuppSDP/Doc5, p15/16). All of these sources are important over the period to 2035. These two sources could add up to 10,500 units to the supply over the plan period. In addition to this, brownfield sites can come forward at higher rates than the allowances set in Schedule 1. Figures from 2006 to 2011 have averaged almost 650 homes on brownfield sites each year in Aberdeen City (BUCS SuppSDP/Doc30 page 4, Table 1) as opposed to the allowance of less than 440 each year (a potential source of an additional 5,000 units). The majority of brownfield sites in Aberdeenshire would come forward as windfalls.

As a consequence of the above, the plan is robust when compared to the findings of the HNDA, historic house building rates and the most recent NRS projections. It contains a generous supply of housing land and there is no need to amend the requirement or identify additional land at this time. Subsequent reviews of the plan will ensure it remains robust.

The plan will be monitored every year and reviewed / replaced on a five year cycle as required by s10(8) of the Town and Country Planning (Scotland) Act 1997 (as amended)

and Circular 1/2009 (para 9). This provides regular opportunities to ensure the plan remains robust over the period to 2035 and beyond.

Responses have indicated that not all of the sites identified in LDPs for the period to 2016 will be built in that period and as a result additional sites need to be identified. However, the requirement for the period to 2016 of 14,202 (Figure 10) is largely met by existing sites in the effective land supply on 1 January 2011 (Schedule 1 - 9,815). The SP and LDPs identify a further 27,300 homes for this period (37,115 in total) but only a small proportion of these need to contribute towards the effective supply and be built during that period. These sites have been identified in the two local development plans and are now coming forward for consent and development. Para 4.24 makes it clear that, due to this level of generosity in the land allowances (which were deliberately front-loaded in the current structure plan), we cannot expect all new homes to be built within the relevant plan period. If this approach was to be adopted, the level of generosity of the plan would need to be significantly reduced.

Paragraph 4.24 is sufficiently clear in context (paras 4.22 – 4.24). Paragraph 4.24 states that the allowances (Schedule 1) are generous and significantly higher than the requirement (figure 10), so 'we cannot expect them all to be built within the relevant plan period'. If the Reporter was minded to agree with the representation, '(set out in Schedule 1)' could be added after 'new homes' in paragraph 4.24 for clarification. However, this paragraph replicates the paragraph in the current structure plan so there is no need for an amendment.

The housing allowance of 67,500 is in line with the generosity required by Scottish Planning Policy (CC/Doc11, paras 66, 71 and 75). There are three phases to the plan which will be used to mitigate against the potential for uncompleted developments if demand does not materialise, or construction takes longer than anticipated.

The selection of sites for development is fundamentally a matter for the two local development plans which were adopted in 2012 following examinations in 2011. The need to deliver significant new infrastructure to accommodate growth has necessitated the development of large sites so considerable flexibility was built into the allowances to account for the uncertainty in the programming of these sites. The review process for these plans, on the back of the proposed SDP, has now started. The Reporters in their examination of the SESplan concluded that the effectiveness of site allocations is a matter for LDPs rather than SDPs.

The HNDAs took account of the demolition proposals at Middlefield as stock needing to be replaced due to road improvements planned for the Haudagain roundabout. However, this is limited to around 300 dwellings (CC/Doc5e, para 3.16). No other programmes of demolition activity are planned so there is no need for the 5,000 replacement homes which were expected at the time of the current structure plan.

In relation to comments regarding Huntly, Peterhead and Laurencekirk, Scottish Water are implementing a growth project in 2013 to remove waste water constraints at Huntly, Site M1 in Peterhead has a development framework (prepared by the landowner) up for approval next month by the Buchan Area Committee and discussions are ongoing in Laurencekirk in relation to trunk road improvements.

Balance of allowances between Housing Market Areas

PP036, PP046, PP097b, PP112b, PP116b, PP191b, PP193b, PP195b, PP196c, PP232b, PP244d, PP245a – There is housing need and demand throughout Aberdeenshire, not just in that part closest to Aberdeen, as evidenced by the Housing Need and Demand Assessment (CC/Doc5e). Housing completions provide evidence of demand in both Housing Market Areas. Between 2006 and 2011, average housing completions in the Rural Housing Market Area were 650 per annum – 36% of the completions in the plan area (Housing Land Audit 2012 – SuppSDP/Doc5, p142).

The sustainability considerations which are outlined in Scottish Planning Policy apply to more rural parts of the area as well as the urban areas. Jobs, services, open space, cultural and recreational facilities and public transport exist in rural as well as urban areas. There is no justification for transferring 50% of the allowances from the Rural to the Aberdeen Housing Market Area and no evidence presented as to how the 50% figure was arrived at.

The change in balance between the two Housing Market Areas between the current structure plan and the proposed SDP is largely a consequence of the removal of the need for 5,000 units in Aberdeen City due to the large-scale demolitions of council stock now no longer being planned. This was reflected in the Housing Need and Demand Assessment.

Balance of allowances between Aberdeen City and Aberdeenshire

PP046c, PP116a, PP126, PP133b, PP232a, PP224b – The plan includes a generous supply of land for housing across the plan area, including in Aberdeen City. A small percentage difference in allowances between the two council areas will not prevent the targets of the plan being met. Brownfield and small sites are able to come forward at rates higher than those targeted in the plan and there is therefore no need to try to artificially match the allowance totals. A number of representations to the plan have also indicated that sites in Aberdeen City are likely to come forward at a faster pace than those in Aberdeenshire due to changing patterns of demand.

The plan makes allowance for 315 units each year on brownfield sites from 2017 onwards. However, completion rates since 2006 have been more than double these levels at almost 650 per year [see Issue 12].

Beyond 2027, the figures at this stage are indicative and subject to review in future strategic development plans. The current allowances are generous and appropriate in both council areas.

In light of the above, there is no need to make any changes to the plan as a consequence of these representations.

Reporter’s conclusions:

Housing Need and Demand Assessment

1. Paragraph 67 of Scottish Planning Policy states that housing need and demand assessments provide the “evidence base for defining housing supply targets in local housing strategies and allocating land for housing in development plans”. It goes on to

make it clear that where such an assessment is found to be robust and credible by the Scottish Government, “the approach used will not normally be considered at a development plan examination”. There is no dispute that the Aberdeen City and Shire Housing Need and Demand Assessment [HNDA] 2035 (October 2011) has been signed-off as robust and credible by the Scottish Government Centre for Housing Market Analysis.

2. The principal criticism of the HNDA is that its projections have been superseded by the National Records of Scotland (NRS) population and household projections, by strategic development plan area, which were published in 2012. Based on those more recent projections, it is contended that the housing allocations set out in the proposed plan are inadequate to provide for growth over the plan area.

3. It is important to acknowledge here that I am tasked with examining the proposed strategic development plan, not the HNDA. The latter has already been confirmed as being credible and robust. Based on that and taken together with the context established in Scottish Planning Policy (summarised in paragraph 1 above) it is clearly not appropriate that I re-examine the adequacy of the HNDA. The authority advises that the HNDA was prepared at the appropriate stage in the development plan process and I agree.

4. It is inevitable in processes with extended run-in times that fresh information may become available which it would have been preferable to have had sooner. The development plan process in this case is at a very advanced stage and I do not consider that the balance of advantage lies with recommending that this process be halted in order that the HNDA can be updated. It seems to me in any event that such a recommendation would be outwith the scope of this examination. That being said, I return to the matter of population growth targets below.

5. It is also contended that the HNDA has been overtaken by the developing economic situation. My conclusions in paragraph 4 above apply equally to this matter.

6. The authority advises that the HNDA was prepared, as required in Scottish Planning Policy, at a functional housing market area level. The current housing market area boundaries were agreed as part of the HNDA process. During that process it was concluded that although some minor change had taken place, it was preferable to retain the established boundaries in the interests of data continuity. In noting the intention of the authority to review the housing market area boundaries, taking into account the output of the 2011 Census, I consider that it would be quite inappropriate at this late stage in the process to recommend that the boundaries of the Aberdeen Housing Market Area be altered. That will properly be considered in the next iteration of the HNDA.

Population growth target and housing requirement

7. Two representations contend that the proposed plan ought not to plan for ambitious levels of population growth, but rather it should allow only for expected levels of growth, and within that context aim for a more balanced and sustainable age range. I cannot identify any provision in either Scottish Planning Policy or Circular 6/2013: Development Planning to suggest that strategic development plans ought simply to provide for anticipated levels of population growth, rather than plan for desired levels of growth. Even if that were not the case, I consider the primary issue here, in the context of preliminary data from the 2011 Census together with the NRS projections, to be whether

the plan provides adequately for anticipated growth. That is all the more important as the Vision for the plan clearly envisages continuing economic growth.

8. The authority advises that the HNDA was based on the then GRO(S) 2008-based population and household projections, refined to take account of more local information. An informed view of local growth prospects was also factored in. That is set out in the HNDA. Table 4.8 of the HNDA indicates a forecast total population of 498,438 by 2033 in Aberdeen City and Aberdeenshire. On that basis, paragraph 4.19 of the proposed plan refers to an anticipated total plan area population of around 500,000 by 2035. This compares with the NRS 2010-based 'principal population projection' of 567,800 by 2035.

9. That equates in the NRS projections to an increase in households of 72,988 (or 35%) between 2010 and 2035. That in turn compares with the housing requirement, set out in Figure 10 of the proposed plan, for an additional 53,972 units between 2011 and 2035. Taking the requirement to plan for a generous supply of housing land into account, the housing allowances set out in Schedule 1 of the proposed plan (including the effective land supply at 2011) allow for the provision of 77,315 units. To that can be added the 1,510 completions during 2010, taking the total to 78,825 units.

10. I will consider later the matter of whether, in this context, the plan allows for a generous supply of housing land. I agree with the authority overall though, that the ad-hoc insertion of the NRS 2010-based projections into the framework of the HNDA would be inappropriate. Paragraph 70 of Scottish Planning Policy makes it clear that the "scale, nature and distribution of the housing requirement for an area identified in the ... development plan should be based on the outcome of the housing need and demand assessment".

11. The HNDA evidence base consists of significantly more than simply population and household projections. To superimpose those more recent population and household projections into that framework, without following the implications of those through the other matters considered in the HNDA would not, in my opinion, result in a safe basis on which to modify the proposed plan. Even if that were not the case, I am satisfied based on my considerations in the paragraphs above, that the proposed plan cannot fairly be said to fail to provide even for those significantly higher projections published by NRS.

12. The 2010-based NRS population and household growth projections indicate a likelihood of faster growth than was previously anticipated. The higher population than expected, reported in the 2011 Census, means that the target population of 500,000 could be met before 2035. That does not, to my mind, indicate a considerably lower housing requirement to 2035. These are long range projections, and are subject to many variables.

13. Paragraph 72 of Scottish Planning Policy states that in city regions, the strategic development plan should identify the housing land requirement up to year 12. It should then include an "indication" of the possible scale and location of housing development up to year 20. The Act requires that strategic development plans are prepared, reviewed and submitted to Scottish Ministers within 4 years of approval of the existing plan. This means that the proposed plan will have been reviewed at least once, and probably twice, before the 12 year initial time horizon of the proposed plan is reached.

14. On that basis, I conclude that the balance of advantage firmly lies with approval of the proposed plan, based as it is on the conclusions of the current HNDA. This will allow

the next round of local development plan preparation to proceed expeditiously, focussing as they are required to do on a period up to year 10 from adoption. The next iteration of the strategic development plan area HNDA will clearly be in a position to base its analysis on the 2010-based projections, or subsequent versions if they become available.

15. The build targets of 2,500 units per annum by 2016 and 3,000 units per annum by 2020, set out on page 33 of the proposed plan, relate to the plan area as a whole. I consider the generosity of housing land supply below. I have no convincing evidence, however, that the Schedule 1 allowances are insufficient to enable those targets to be met.

16. I note the criticism of the proposed plan as lacking in ambition. The housing allowances are said to be insufficient to the extent that they could jeopardise the population and economic growth objectives of the plan. In this regard there appears to be no dispute that the economy of the plan area, and as a product of that the local housing market, has withstood the recent economic downturn better than many areas of Scotland and, indeed, the UK as a whole.

17. It is clear that the buoyant economic performance of the area has been fully considered in the HNDA (in particular chapters 2 and 7), and factored into its forecasts of the annual housing requirement. I am satisfied that, in turn, those forecasts of housing requirement are adequately provided for in the proposed plan. In that case there is no persuasive evidence before me that the housing allowances set out in the proposed plan are likely to stifle economic or population growth.

Generous supply of housing land

18. I appreciate the concerns expressed in some representations that larger sites can be less flexible than smaller sites in regard to delivery. The scale of growth envisaged, particularly in the 4 strategic growth areas, brings with it, however, a need for significant investment in infrastructure. The provision of such infrastructure is more likely to be achieved through the development of larger sites. I am in no doubt though, that a mix of site sizes would be best placed to achieve the growth rates required in the proposed plan.

19. I agree with the authority that the effectiveness of housing site allocations is principally a matter for local, rather than strategic, development plans. It will be for the 2 councils to ensure that their local development plans allocate appropriate and sufficient effective land, or land capable of becoming effective and being developed during the plan period. That requirement is clearly set out in Scottish Planning Policy and I see no advantage in repeating it, or expanding upon it, in the proposed plan.

20. Many of the representations contend, for various reasons, that the allocation of housing land provided for in Schedule 1 is not sufficiently generous. Conversely, a number contend that the allocations are over-generous, rendering it likely that the “easy sites” will be developed, leaving difficult sites undeveloped.

21. I have found above that the proposed plan provides for a scale of housing allocations in a manner consistent with the outcomes of the HNDA, as required by Scottish Planning Policy. Paragraphs 70 and 71 of Scottish Planning Policy also require that a generous supply of housing land be provided for in the development plan, in order to allow for flexibility. That is a clear requirement of Scottish Planning Policy, and the

authority was not in a position, in establishing the scale of housing allowances, to depart from that requirement. The proposed plan aims to achieve population and economic growth; such growth is projected in the HNDA. I am satisfied on that basis there is no evidence to lead me to conclude that the housing allocations are significantly over-generous. On the matter of “easy sites” being developed in preference to larger sites, the local development plans will require to ensure that there is an appropriate balance of such sites, and that those larger sites which are allocated are effective or capable of becoming so.

22. I agree with the authority that those representations seeking to add 25 – 30% flexibility to the 2010-based projections would result in arbitrary allowances. Such a level of allowances would not be appropriately evidence-based and there would be a significant risk of an over-allocation of sites in the local development plans, leading to a greater risk of ‘cherry-picking’ of sites.

23. Paragraph 3.8 of the HNDA reports that over the 10 years from 2000/1 to 2009/10, an average of 2,108 units were completed across Aberdeen City and Aberdeenshire. That average rate of completions is said to have been largely unaffected during the downturn in the housing market, unlike the situation elsewhere in Scotland. During that 10 year period, annual completion rates varied between 1,630 units in 2006-07 and 2,770 units in 2004-05. Looking further back, the authority states that on only 7 years out of 32 have completions exceeded 2,500 units per annum, and on only three of those (1984, 1985 and 1993) have they exceeded 3,000 units.

24. Against that historic context, the proposed plan aims for annual completions of 2,500 units per annum by 2016 and 3,000 units per annum by 2020.

25. I note the contention of some representees that the allowances of the current structure plan have simply been rolled forward, with effectively no new allocation being required for the additional 5 year rolled-forward period. It can be seen from Schedule 1 that the plan provides for 77,315 units, consisting of an effective supply of 9,815 units at 2011, together with allowances of 67,500 units. That would be sufficient to allow for an average completion rate of 3,093 units per annum over the 24 year period 2011-2035. That represents a completion rate 43% above the housing requirement derived from the HNDA and set out in Figure 10 of the proposed plan. There is clearly also potential for additional units to arise from the constrained land supply and from small sites, although those are not reflected in the 143% supply rate.

26. On that basis I find the housing allowances set out in Schedule 1 to be appropriately generous, and to be in accordance with the generous supply requirement of Scottish Planning Policy. I now move on to consider other detailed points of representation relating to the nature of the supply.

27. Matters specific to the housing allowances for Aberdeen City are considered in detail under Issue 12. In the interests of forming a view on the generosity of the overall housing land supply, however, I consider them here briefly also. Schedule 1 envisages 10,500 units arising from development of brownfield sites in Aberdeen City. To that is added an effective brownfield supply of 1,188 units. A number of representations argue that this represents an over-reliance on brownfield sites which could endanger achievement of the plan’s growth targets.

28. The Aberdeen Brownfield Urban Capacity Study, published in December 2012, reports an average annual brownfield completion rate, in Aberdeen City over the period 1991-2011, of 646 units. The study goes on to identify sufficient land to accommodate between 340 and 600 units per annum over the 10 year period from 2012. That indicates to me that there appears to be sufficient scope to accommodate the scale of brownfield development required by the proposed plan, certainly for the period to 2016, and well into the period to 2026.

29. Development of brownfield sites is clearly in accordance with Scottish Planning Policy and with the plan Vision. The statutory requirement for cyclical review of the plan provides reassurance that the capacity of brownfield sites to deliver the allowances set out in Schedule 1 beyond that timescale is timeously reviewed, with adjustments to the allowances being made if appropriate. On that basis, I find there to be no evidence at present to lead me to conclude that the scale of brownfield allocations is inappropriate.

30. I note that large scale demolitions of housing stock in Aberdeen City are no longer envisaged, and that the HNDA took account of the smaller scale demolitions likely to result from the planned improvements to the Haudagain roundabout. On that basis there is no need for the 5,000 replacement homes planned for in the current structure plan.

31. It will be for the local development plans to allocate land for housing development in accordance with the plan's Vision and Spatial strategy. Taken together, these clearly express a requirement that development be sustainable and that the majority of housing and employment land be provided in the strategic growth areas. In that context I see no need to provide further specific guidance on the location of housing land close to employment land.

32. I am satisfied that paragraph 4.24 expresses sufficiently clearly the expectation that not all new homes provided for in Schedule 1 can be expected to be built in the relevant plan period, as those allowances provide for flexibility through generosity of supply.

Balance of allowances between housing market areas

33. The balance of allowances between the Aberdeen Housing Market Area (AHMA) and the Rural Housing Market Area (RHMA) is clearly derived from the HNDA. The resultant housing requirement set out in Figure 10 allocates approximately 27% of the requirement to the RHMA. In this regard I note that the Housing Land Audit (2012) reports that, between 2006 and 2011, the RHMA accounted for 36% of completions in the plan area. I take this to reinforce the conclusion of the HNDA of continuing need and demand in that market area.

34. There has clearly been recent focus on boosting completions within the AHMA, and particularly in Aberdeen City, and I consider that to be entirely consistent with the plan's Spatial Strategy. In this context I find the balance of allowances between the AHMA and the RHMA provided for in the proposed plan to be appropriate and to be clearly evidenced. I note in addition the authority's explanation that minor adjustment in the balance of allowances, compared to those in the current structure plan, results largely from large scale demolitions no longer being envisaged in Aberdeen City.

35. Similarly, I can see no justification for allocating a greater proportion of allowances in the Local growth and diversification areas to the AHMA. I consider that to do so would unreasonably constrain growth to meet local needs over the RHMA, in addition to diluting

the effectiveness of the strategic growth areas within the AHMA. It will be for the local development plans to allocate specific sites for development in those parts of the Local growth and diversification area located within the RHMA. I am satisfied that the provisions of the plan, and particularly those set out at paragraph 3.42, will ensure that such allocations are proportionate to the host settlement. Within that context, and as employment opportunities as well as other facilities and services are present throughout the rural area, I see no inherent tension with the sustainability objectives of the proposed plan or those of Scottish Planning Policy.

36. Conversely though, any significant increase in allowances over the Local growth and diversification areas in both housing market areas would not be consistent with the findings of the HNDA. To do so would, in any event, introduce a real risk of development taking place contrary to the interests of sustainable development.

37. Finally on this matter, I note the authority's comments on the effectiveness of specific sites at Huntly, Peterhead and Laurencekirk. I find at paragraph 19 above that the effectiveness of housing site allocations is principally a matter for local, rather than strategic, development plans. In this context also I am satisfied that the balance of allowances between the housing market areas is appropriate and consistent with the HNDA.

Balance of allowances between Aberdeen City and Aberdeenshire

38. Schedule 1 sets the total allowances for Aberdeen City and Aberdeenshire at 31,500 and 36,000 units respectively. That represents a proportion of 46.7% against 53.3% in favour of Aberdeenshire. On the face of it, I agree with representees that this appears inconsistent with the target expressed on page 8 of the proposed plan that at least 50% of all homes should be built within Aberdeen City.

39. Those allowances do, however, include a very significant degree of generosity over the actual housing requirement. I agree with the authority that in this context a small imbalance in allowances should not prevent the 50% target being met. In addition, there is evidence in the Aberdeen Brownfield Urban Capacity Study that brownfield sites are coming forward at rates higher than those needed for the plan targets to be met.

40. I find that there is no need to adjust either the 50% target or the balance of allowances between both council areas.

Conclusion

41. Drawing all of these matters together, I conclude that the scale and distribution of growth provided for in the housing allowances is appropriate and sufficient, in accordance with the requirement of paragraph 117 of Circular 6/2013.

42. In reaching this conclusion, and for the avoidance of doubt, I confirm that I have fully considered those matters raised under representations PP091 and referenced under Issue 10.

Reporter's recommendations:

No modifications.

Issue 6	Sustainable Mixed Communities	
Development plan reference:	Chapter 4 (Page 36 & 37)	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> SportScotland (PP010a) Sigma Capital Group plc (PP027a) Scotia Homes (PP104h) Scottish Enterprise (PP189a) NHS Grampian (PP213g)</p> <p><u>Affordable Housing</u> Sandlaw Farming Ltd (PP039b) Kirkwood Homes Ltd (PP096) Stewart Milne Homes (PP119) Scotia Homes (PP134h) Homes for Scotland (PP143) Dunecht Estates (PP148d) CALA Homes (East) (PP162) NHS Grampian (PP213h) Polmuir Properties (Newtonhill) Limited (PP239) Bancon Developments Ltd (PP246a)</p> <p><u>Greenspace</u> - Scottish Natural Heritage (PP074)</p> <p><u>Density</u> Sandlaw Farming Ltd (PP039c) Dunecht Estates (PP148c) D Fairlie Partnership (PP156, PP158a) Nicola Hutcheon (PP176) RBCTP Town Planning (PP181)</p> <p><u>Mixed Use</u> Sandlaw Farming Ltd (PP039a) Polmuir Properties (Newtonhill) Ltd (PP135) D Fairlie Partnership (PP158b) Nicola Hutcheon (PP164)</p> <p><u>Sport and Recreation</u> Sportscotland (PP010b)</p> <p><u>Quality of Design</u> Scottish Natural Heritage (PP071, PP075) Old Aberdeen Community Council (PP223)</p> <p><u>Other</u> Sigma Capital Group Plc (PP027b) Scottish Enterprise (PP189b)</p>		

<p>Provision of the development plan to which the issue relates:</p>	<p>Sustainable Mixed Communities</p>
<p>Planning authority's summary of the representation(s):</p>	
<p><u>Support</u></p> <p>PP010a – We support the need outlined in paragraph 4.33 for new development to be sustainable and meet the needs of the community and paragraph 4.39 on the need for new housing to improve people's quality of life.</p> <p>PP027a – Support for the principle of sustainable mixed use communities and the efficient use of land.</p> <p>PP104h – Support for the recognition in para 4.34 and 4.39 that it is important not to deal with different land uses in isolation but rather focus on integration of uses. This will be potentially important at the Cromleybank site in Ellon.</p> <p>PP189a – Welcome the masterplanning process to raise the design standards of new development, bringing benefits to developers and communities.</p> <p>PP213g – Support for the holistic approach to land use in relation to SMC's. Reference to health care in para 4.34 as a key component of SMC's is recognised and welcomed. The importance for developers of major development proposals to engage as early as possible with NHS Grampian is highlighted in relation to health care provision.</p> <p><u>Affordable Housing</u></p> <p>PP039b, PP148d - It is noted that the Housing Need and Demand Assessment suggested a requirement for around 38% of new homes to be affordable. However, affordable housing can only be achieved through the continued development of mainstream housing. Increasing the affordable housing requirement to 38% would make it extremely difficult to deliver housing development at all. Even at a level of around 25% there will be a continuing impact on the viability of many developments and if mainstream housing is to be encouraged in order to realise affordable housing, the requirement should be lowered. Whilst the requirement would be lower, the number of sites capable of development could potentially increase, thereby realising a higher number of affordable units. There should also be greater flexibility in how the affordable housing requirements are met. This should provide for a range of options, including commuted sums and low cost home ownership. Private rented could also be a further option.</p> <p>PP096 – The SDP should continue to encourage both councils to get involved with initiatives from the Scottish Government, partnership approaches to delivery and the range of tenures available. The SDP should make it clear that 'around 25%' does not allow for the requirement of 30% or more in LDP's. Types and sizes of housing is only an issue for affordable housing. The mix for mainstream housing should be left to the market and developer.</p> <p>PP119 – The plan provides insufficient certainty about the level of affordable housing required. The figure of 25% should be an upper limit. The plan needs to be clear that all methods of delivery should have equal status (rather than a hierarchy of options),</p>	

flexibility should be shown in delivery, the requirement should be expressed as a percentage equivalent and requirements should not make a development unviable.

PP134h – It is important that flexibility in the delivery of affordable housing is achieved and this can be done in a number of ways through private sector development, potentially sustainable mixed use neighbourhoods.

PP143, PP246a – The proposed plan appears deliberately vague on the issue of Affordable Housing. We are firmly of a view that the SDP should be clearly setting an upper limit of 25% as experience shows that if an upper limit is not set, LDPs subsequently set artificially high targets which result in the stifling of delivery of required development. Partnership approaches to delivery must also be encouraged as well as recognition that there are a number of ways to deliver affordable housing, not just social-rented, and that developers are well placed to deliver low cost homes, and shared equity models. It is also important that the SDP highlights that the types of affordable housing listed in PAN 2/2010 are a suite of options rather than a sequential approach to be worked through. The two local authorities should be actively encouraged to use the full range of options available, as this will give them the best opportunity to deliver much needed affordable housing throughout the plan area. One way of assisting this is to ensure that Affordable Housing and Planning Gain burdens do not undermine project viability and a clear policy addressing the issue of developer contributions would greatly assist with providing the necessary clarity.

PP162 – An upper limit of 25% affordable housing should be set and provision should be directed to the most suitable locations rather than the broad umbrella policies currently in place.

PP213h – Affordable housing provision is an important consideration and can only realistically be considered through the development of mainstream housing. The scale of affordable housing should not be so onerous as to deter development. If the requirement deters mainstream house building then the amount of affordable housing delivered would be reduced. There should be some recognition as to the provision of key worker accommodation for both healthcare workers and the wider public sector and also for the provision of student accommodation. NHS Grampian and the Universities have significant land holdings and where that land becomes surplus to their needs, consideration should be given to the matter of key worker or student accommodation being provided as all or part of the affordable housing provision.

PP239 – The SDP should set an upper limit of 25% for affordable housing and state that affordable housing policies within LDPs require to accord with PAN 2/2010. It is important that flexibility in delivery is achieved and that this can be achieved in a number of ways through private sector development and public sector finance, where available.

Greenspace

PP074 – There is an omission from this section on the importance of incorporating ‘green components’.

Density

PP039c, PP148c, PP176, PP181 – The target density of 30 dwellings per hectare is over prescriptive and, in many instances, may not be appropriate in certain locations.

PP156, PP158a – It is right to specify a target for development density. The figure of 30

units per hectare is about right and is therefore supported and should apply to all development. However, the figure quoted relates to a density of dwellings per hectare. In a mixed use area this density should be units per acre (a unit being either a residential or employment unit). The target should be extended outwith the strategic development areas such that the density of development in these areas should relate to development densities in existing established settlements in the area. In this way it means that inappropriate, low density suburban development will not be forced upon many of the small settlements outwith the strategic development areas just because a target is not set.

Mixed Use

PP039a – In certain communities, such as Banchory, further housing is required better located to utilise the existing services and facilities located in the town centre. Not every development should be required to provide a mix of uses.

PP135 – The SDP should translate locational requirements for cohesive residential, employment and community growth into a policy promoting sustainable mixed use settlement extensions where existing infrastructure capacity exist.

PP158b – More clarity is required on employment uses in mixed communities. Significant provision of employment spaces should be provided, not just token shops, to make a neighbourhood be considered sustainable.

PP164 – It is inappropriate and counter-productive to require all new house building to provide services and facilities as part of the development. This is only appropriate on large-scale sites, while on smaller sites ready access by walking, cycling and public transport should be sufficient.

Sport and Recreation

PP010b – In relation to new development, particularly new housing development, any masterplan process should encourage sport and physical recreation.

Quality of Design

PP071 – There is a need to include a monitoring target to address quality of design in relation to the provision of new housing for the increasing population.

PP075 – Fourth target on page 37 should be elaborated on, to outline how the quality of new developments will be quantified by acknowledging 'place' as the integral component.

PP223 – While the targets on pages 36 and 37 are all laudable, there is no mention of building aesthetics. We urge the councils to champion innovative development which adds greatly to the character of the environment.

Other

PP027b - The Plan must recognise that, in rural areas, the majority of new development will come forward on greenfield land.

PP189b – It is important that both councils planning teams are adequately resourced to

assist in the delivery of masterplans and determination of planning applications without slowing down the process. Processing agreements can have a role to play in this. The SDP needs to highlight the importance of this.

Modifications sought by those submitting representations:

Support

PP010a, PP027a, PP104h, PP189a , PP213g – None sought

Affordable Housing

PP039b, PP148d – The target relative to affordable housing should be amended to remove any reference to target percentages.

PP096, PP239 – The SDP should set an upper limit of 25% for affordable housing and state that affordable housing policies within LDPs require to accord with PAN 2/2010. It is important that flexibility in delivery is achieved and that this can be achieved in a number of ways through private sector development and public sector finance, where available.

PP119 – Set an upper limit for 25% of homes to be affordable. Make reference to the requirement of affordable houses to be a percentage equivalent to recognise that cross funding through commuted sums may be required. The SDP should highlight the types of affordable housing listed in PAN2/2010 as being appropriate and a suite of options (rather than a sequential approach) for affordable housing. The SDP should make it clear that any requests for affordable housing and planning gain should not undermine the viability of development.

PP134h, PP213h – None specified

PP143, PP162, PP246a - The SDP should be clearly setting an upper limit of 25% Partnership approaches to delivery must also be encouraged as well as recognition that there are a number of ways to deliver affordable housing, not just social-rented. It is also important that the SDP highlights that the types of affordable housing listed in PAN 2/2010 are a suite of options rather than a sequential approach to be worked through. The two local authorities should be actively encouraged to use the full range of options available. A clear policy addressing the issue of developer contributions would greatly assist with providing the necessary clarity.

Greenspace

PP074 – Addition to 4.38 after sentence 2 of: *The provision of open space, landscaping and other greenspace should be considered in new residential development proposals. Paths and greenspace should aim to link to the wider green network. New development should seek to achieve a sense of place.*

Density

PP039c, PP148c – The requirement for a housing density of no less than 30 dwellings per hectare should be removed.

PP156, PP158a – Change the words "30 dwellings/hectare" to "30 units/hectare". Include an additional target saying "[f]or all development of over one hectare outwith a strategic growth areas to be in line with approved supplementary guidance and generally have a density of development that is shown to be similar to existing and established settlements in the local area."

PP176, PP181 – Amend bullet 3 on page 37 to read *"Housing densities of individual development sites will vary, but the aggregate density of all new housing developments within each strategic growth area shall be generally not less than 30 dwellings per hectare."*

PP176 – Reword bullet point 3 on page 37 to read... "Housing densities of individual development sites will vary, but the aggregate density of all new housing developments within each strategic growth area shall be generally not less than 30 dwellings per hectare."

Mixed Use

PP039a – None specified

PP135 – The SDP should translate locational requirements for cohesive residential, employment and community growth into a policy promoting sustainable mixed use settlement extensions where existing infrastructure capacity exist.

PP158b – Additional wording should be introduced that speaks about the mix as being not only mixed property sizes and types (i.e. large houses, small houses, flats) but also retail spaces, restaurants, offices, hotels, workshops, commercial units and factories, schools and other civic buildings.

A planning application for any development (on residential and employment allocations) over one hectare that is not mixed use should contain a statement explaining why mixed use is not appropriate for the site. Council's should be able to refuse an application for planning consent if this statement is not robust.

A target needs to be set that identifies that in a mixed use area there is a target of approximately one job space to be provided for every dwelling in the mixed use area.

PP164 – Delete requirement that services and facilities must be a part of the development; Delete statement that plan will not support house building that fails to provide these services and facilities; and Reword para. 4.38 to read...'New development needs to focus on communities. On large scale development areas sufficient to provide a viable catchment population for them, services and facilities for the community should be part of the development area. On smaller sites it is sufficient that a proposed development will have ready access to such services and facilities by walking, cycling and readily available public transport and that it will support or enhance the viability of such services and facilities. The purpose is to create and/or support successful and sustainable communities.'

Sport and Recreation

PP010b – Sport and physical recreation could usefully be promoted through the proposed SPG on page 37 on urban design principles and community facilities.

Reference could also be made on page 36 of the SDP on the need to consider sport and recreation provision as part of new housing development and as a significant contribution to the quality of life of the local community. A similar reference should be made in the targets on page 37 of the SDP.

Quality of Design

PP071 – Addition of a Monitoring bullet point on page 33 – *“Monitoring will assess trends in population growth and house-building in the area and will assess the quality of housing development”*.

PP075 - Amend the 4th target listed on page 37: *“For the quality and design of new developments in the city region to be nationally recognised for their success in creating strong sense of place”*.

PP223 – Add a new target ... *“Outside of conservation areas and other areas of specific interest, we will embrace diversity of new building design and materials to bring new energy into the visual aesthetics of our built environment.”*

Other

PP027b - The Plan must recognise that, in rural areas, the majority of new development will come forward on greenfield land.

PP189b – A new bullet point should be inserted in the section on the Objective for Sustainable Mixed Communities under Targets to read...*“Sites identified in local development plans should be capable of being delivered in accordance with the timescales in these plans”*.

In the section on How to Meet the Targets a new bullet point should be inserted to read as follows: *“High priority will be given by local planning authorities to the effective and efficient delivery of masterplans and the use of processing agreements to assist in the determination of major planning applications.”*

Summary of responses (including reasons) by planning authority:

Support

PP010a, PP027a, PP104h, PP189a, PP213g – Support welcomed

Affordable Housing

PP039b, PP096, PP119, PP134h, PP143, PP148d, PP162, PP213h, PP239, PP246a – Local development plans (particularly supplementary guidance) and local housing strategies are the place for detailed policy and guidance on the delivery of affordable housing. This is made clear in both Scottish Planning Policy (CC/Doc11, para 87) as well as the plan itself (para 4.35 and target 5 on p37). The level of detail requested by some representations is not appropriate in the SDP which is required to set the strategic context. The Proposed SDP does this by highlighting the scale of need identified in the Housing Need and Demand Assessment (CC/Doc5e) as 38% of all new housing (para 4.35), a figure not disputed in representations.

In recognition of the challenges around the availability of Scottish Government funding and impacts on development viability, the plan recognises that trying to meet that 38% figure would not be appropriate (para 4.35). As a consequence, the plan requires the delivery of “appropriate levels of affordable housing (around 25%)” (Target 5, page 37). However, the plan recognises that meeting even this level of affordable housing will require considerable effort and creativity on the part of both public and private sectors. Scottish Planning Policy (CC/Doc11, para 88) sets a benchmark of 25% which can be varied in response to evidence (in local development plans and local housing strategies). To set 25% as a maximum would reduce flexibility and could prevent affordable housing being delivered by eliminating the scope in appropriate cases to deliver more than 25% to compensate for those occasions where less than 25% can be achieved. If no percentage were stated in the plan, the benchmark in Scottish Planning Policy would still apply. Representation PP119 misquotes the target on page 37 of the plan.

There is no value to be added by repeating the contents of Planning Advice Note 2/2010 (SuppRep/Doc47). While the range of types of affordable housing is important, the Housing Need and Demand Assessment makes it clear that most of the need can only be met by social rented accommodation (CC/Doc5e, para 6.86 – 6.92). This is likely to be a significant factor in policy preparation and the negotiation of affordable housing requirements on individual sites. However, paragraph 4.35 makes it clear that effort and creativity will be required on the part of both public and private sectors to meet the targets of the plan.

Housing which meets a need identified in the Housing Need and Demand Assessment would be seen as contributing to meeting an affordable housing requirement. Accommodation for key workers and students could fall into this category, depending on the cost.

Due to the relatively robust nature of the local economy, the impacts of affordable housing requirements on development viability are likely to be less significant than elsewhere in Scotland. However, beyond the current text of the proposed plan, issues of viability are more site-by-site in nature and a matter for detailed policy and guidance.

The first sentence of para 4.35 has not been challenged. A mix of home types and sizes is important for market housing as well as affordable housing to support the creation of sustainable mixed communities.

Greenspace

PP074 – It is important that the plan is read as a whole rather than expecting cross-references everywhere (paragraph 1.9), recognising the links between the different parts of the plan. Therefore, each objective should not be seen in isolation and issues put forward in one part of the plan should also be seen in the wider context.

Sections within the plan on both Strategic Growth Areas (paragraph 3.10) and Quality of the Environment (paragraph 4.31) highlight the importance of building on and enhancing green networks within the region. Paragraph 4.34 highlights the importance of open space and leisure opportunities in the creation of sustainable mixed communities and that such development creates a strong sense of place. Each component of the suggested amendment to the text can already be found within the plan and to add a new paragraph would not be appropriate.

Density

PP039c, PP148c, PP156, PP158a, PP176, PP181 – The target in the plan (target 3, p37) is not over-prescriptive and has been misrepresented in representations. The target refers to specific developments (over one hectare in size and in a strategic growth area) and requires them to be in line with approved supplementary guidance and ‘generally’ have no less than 30 dwellings per hectare. There may well be cases where a density of less than 30 may be appropriate and the plan allows for this (where it is agreed as part of a masterplanning process for example). However, there is also a need to use land efficiently (paragraphs 4.33 and 4.37) and provide for a range of house types and sizes (para 4.35).

While there is a requirement to use land efficiently throughout the area (para 4.33 and 4.37), it is not necessary to specify what this might mean outwith the strategic growth areas in the SDP. This can appropriately be dealt with in local development plans, development frameworks and masterplans. The density of adjacent uses may not always be a good guide given the inefficient use of land in the recent past.

It is important that density is explicitly related to housing because non-residential units will vary considerably in size and could not be included within the same target. Small non-residential units would need to be taken into account when interpreting density calculations but this matter is too detailed for the SDP.

Mixed Use

PP039a, PP135, PP158b, PP164 – The delivery of sustainable mixed use communities is fundamental to the delivery of the plan and does not need to be emphasised further. The plan does not require a mix of uses on every site. The plan requires local development plans and masterplans to fully consider the scope for a mix of uses on a site (Target 6, p37). The size and location of a site will be key considerations in this. However, even on housing sites the plan would expect a mix in terms of the type, size and tenure of homes to meet the needs of the community (paragraph 4.35). Specifying the number of job spaces per dwelling is too prescriptive as what is appropriate will vary from site to site depending on surrounding land uses as sites will not be self-contained. Paragraph 4.38 is not intended to imply that site size is not a factor to be taken into account in determining what is appropriate for a specific site but there is no need to make the changes suggested as they would require a definition of “small site”.

Sport and Recreation

PP010b – Sport and physical recreation are considerations for masterplanning processes but there is nothing to be gained from making reference to this throughout the document. Highlighting them here would require a full list of considerations to be included and that would not be appropriate, particularly as attempts have been made throughout the plan to be as concise as possible.

Quality of Design

PP071, PP075, PP223 – The monitoring section on page 33 (population growth) will be achieved through population estimates and the preparation of a Housing Land Audit (HLA). The objective on population growth (p32-33) relates to the scale of growth, whereas the objective on sustainable mixed communities (p36-37) focuses on the quality

of the growth. This distinction should be maintained and it would not be appropriate to duplicate references to development quality in the monitoring of population growth. Targets and actions on p37 already focus on the quality of new development. These will be monitored but there is no need to empty state this in the plan itself.

The plan highlights the importance of setting the highest standards of urban and rural design to create a strong sense of place (para 4.34). It also targets national recognition for the design of new development (target 4) and maintaining the design review process, designed to improve the quality of new development. The detail of design policies is more a matter for the Local Development Plans, within the context set by the SDP.

The importance of creating a sense of place in new development has been highlighted in the plan (paragraph 4.34) and there is no value to be added by including the phrase in the fourth target on page 37.

Other

PP027b – There is no need to explicitly state that in rural areas the majority of new development will come forward on greenfield land.

PP189b – Both councils are focused on the efficient determination of planning applications and the role that processing agreements can play in this process. However, the SDP is not the place to make such statements. The plan includes targets for the construction of new homes which is a much more appropriate way of expressing the importance of delivery of new development on the ground rather than the procedural issue of the determination of applications. The plan does not require the delivery of individual sites within specific time periods because the allocations considerably exceed the requirement for new homes and employment sites. More detail on this is provided under Issue 5.

In light of the above, there is no need to make any changes to the plan as a consequence of these representations.

Reporter’s conclusions:

General Comment

1. While I have considered the individual merits of the matters raised under this issue, I have also been conscious that, with the exception of Paragraph 4.34 and some of the text about affordable housing, most of this part of the plan has been rolled forward from the approved structure plan without change. Given these circumstances, my approach has generally been to avoid recommending modifications unless circumstances have clearly changed. I have considered the unresolved representations on the matters set out below on that basis.

Affordable Housing

2. As the authority has pointed out, no representee has questioned that a significant need for affordable housing exists in the Aberdeen city region or that new housing development should contribute towards meeting this need. However, concerns have been raised about the level of the requirement, the type of affordable housing contribution being sought, and the effect on the viability of development.

3. The proposed plan contains a target for ‘around 25%’ of new housing to be affordable. Representees have argued that this is too vague, should be recast as a maximum, or that there should be no specific target. Paragraph 87 of Scottish Planning Policy states that, where the planning system has a role to play, the development plan should be clear on the scale and distribution of the affordable housing requirement for the area and should outline what is expected from prospective developers. Detailed policy should be set out in supplementary guidance. Paragraph 88 provides 25% as a benchmark contribution.

4. It is appropriate for the strategic development plan to tackle the issue of affordable housing as part of its wider responsibility to ensure that housing requirements are met across the city region. But the strategic development plan is not site specific and, as has been pointed out by some representees, it can be useful to retain some flexibility in order to respond to local circumstances and factors such as development viability. Current government policy describes 25% as a benchmark, while the housing need and demand assessment shows a need exists for 38% of new homes to be affordable.

5. In this context I conclude that the target in the proposed plan for ‘around 25%’ of housing to be affordable is reasonably precise and is preferable to a recasting of this figure as a maximum. Indeed setting a maximum figure could be said to be a less certain policy position as it would encompass a range of provision between 0 and 25%. It is sensible that the wording in the proposed plan allows for some limited variation to be applied at lower tiers of plan-making in response to local circumstances. There will be an opportunity for local development plans to set more precise affordable housing requirements for individual areas or sites in due course, in line with government policy at the time. Supplementary guidance can be used to provide further detail either on a thematic or site-specific basis, including describing when other forms of provision such as commuted payments may be appropriate.

6. Paragraph 86 of Scottish Planning Policy is clear that affordable housing can take a number of forms, including a range of tenures. The proposed plan does not attempt to specify what type of affordable housing should be provided. The delivery of affordable housing can be complex and challenging, and there are a range of affordable products to be considered. It is therefore wise for the plan to state as it does in paragraph 4.35 that it will be the two councils’ local housing strategies that will consider the detail of affordable housing provision. The principal role of the planning system is to provide a supply of land for affordable housing: it is more for the councils’ housing services to consider the particular tenure types that are deliverable and will meet identified needs. There is no suggestion in the proposed plan that a sequential approach should be applied whereby social rented housing is a first preference, so I see no need to address this matter in a modification.

7. It is important that the overall viability of development is not threatened by excessive affordable housing requirements. Paragraph 87 of Scottish Planning Policy states that policies on affordable housing should be realistic and take into account considerations such as development viability. The authority argues that the strength of the North East Scotland economy means that viability issues are likely to be less significant, but that this matter can be addressed on a site-by-site basis. In my view, while it is desirable for policies to consider development viability, it is more likely to be at the local development plan or supplementary guidance level that any detailed policy exceptions can more naturally be described. At this strategic tier of plan-making, the high level policy statements in the proposed plan are appropriate and sufficient.

8. There is a suggestion that the plan should highlight the need for key worker and student housing and that the development of university or health service land should be able to meet its affordable housing requirements through the provision of key worker housing. Key worker housing is not identified as a separate concept in Scottish Planning Policy or Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits. If such particular needs could be identified, I would have expected this to emerge through the housing need and demand assessment process, but I have not identified any such reference. Paragraph 89 of Scottish Planning Policy identifies students as a group who may typically demand houses in multiple occupation, the need for which should be addressed in the development plan. Paragraph 5.144 of the housing need and demand assessment identifies the importance of the student market, but only within Aberdeen City. Given this more localised demand for student accommodation, I consider that this is a matter more appropriately dealt with at the local development plan level.

9. Overall I conclude that no modification is required to the plan regarding affordable housing.

Greenspace

10. In response to a call for this part of the plan to mention the green components of placemaking, the authority has pointed to other references to these matters elsewhere in the plan. It is the case that the plan is to be read as a whole. Paragraph 3.10 of the proposed plan discusses green networks and tree planting in the context of the creation of successful sustainable mixed communities; Paragraph 4.31 stresses the importance of accessible green networks; and Paragraph 4.34 refers to open space in the context of the creation of sustainable mixed communities. As a wide term, open space could be said to encompass landscaping and other greenspace, and indeed is the catch-all term used in Scottish Planning Policy.

11. The proposed plan does take a relatively high level approach to all aspects of placemaking, including greenspace/ open space. But I note that Paragraph 41 of Circular 6/2013: Development Planning does not expect placemaking to be a principal topic for strategic development plans. Local development plans and supplementary guidance may be expected to cover this topic in more depth. I therefore conclude that the treatment of this topic in the proposed plan is sufficient.

Density

12. The proposed plan contains a target for housing developments over one hectare in strategic growth areas to generally have no less than 30 dwellings per hectare. A number of representees oppose the principle of this approach, while others feel that the threshold is too low, or that the density should be sought as an average across the strategic growth area rather than being applied to individual developments. It is suggested that the approach should also be followed outwith strategic growth areas, or should be applied to a mix of uses beyond just housing.

13. Paragraph 77 of Scottish Planning Policy states that the efficient use of land should be a key consideration in a settlement strategy. It is therefore appropriate for the plan to consider the density of forthcoming development with a view to ensuring that land is not used wastefully. The first bullet point under How to meet the targets on Page 37 of the proposed plan requires local development plans to take account of the strategic development plan's targets when identifying land for development. Therefore, while

Paragraph 83 of Scottish Planning Policy makes it clear that appropriate densities will vary depending on the character of the place, it may be expected that the sites emerging for development through the development plan will be largely suitable for development of at least 30 dwellings per hectare (for instance by being placed in accessible locations).

14. Nevertheless, it is inevitable that site specific factors will mean that the achievable density on individual sites will vary. I consider that the proposed plan covers this eventuality suitably through the inclusion of the word 'generally' and the reference to supplementary guidance, which can specify the density requirements for individual sites more precisely if necessary.

15. Regarding a suggestion that the one hectare threshold is too low, again the word 'generally' allows for circumstances where a 30 dwellings per hectare density is not appropriate. The arguments presented suggesting the target will be harder to achieve for small sites may be balanced against other possible factors such as the lower likelihood that small sites will have to provide wider community infrastructure within their boundaries. I therefore conclude that the one hectare threshold is appropriate.

16. Aggregating the density target across strategic growth areas might be useful for monitoring purposes. However, it would not be a useful policy approach to apply to individual proposals because it would be difficult to assess what density particular sites needed to achieve to deliver the wider target. I therefore conclude that this approach should not be introduced.

17. The suggestion that the density target should apply to a range of uses also has attractions in terms of ensuring that land for all purposes is used as efficiently as possible. However I do not consider it would be practical to introduce such a requirement, at least in the simple way suggested, due to the wide variation in the characteristics of non-residential development.

18. Regarding the approach to density outwith the strategic growth areas, I consider it desirable that land be used efficiently throughout the plan area. However given that this part of the plan has been rolled forward from the existing structure plan, and there is no clear change in circumstances I do not recommend any modification. I agree with the authority that the suggested approach for the local growth areas of matching the density of new development to that of existing settlements would not be appropriate. Existing densities should not necessarily provide a guide for future proposals as past development may not have used land as efficiently as it could.

19. Overall I conclude that the proposed plan's approach to density is appropriate and sufficient.

Mixed Use

20. The proposed plan calls for the highest standards to be set in terms of the mix of land uses, and contains a target for local development plans and masterplans to consider the scope for a mix of uses on a site. However there are no prescriptive requirements. Some representees oppose a perceived requirement to provide a mix of uses; others call for stronger references to mixed use such as a policy for mixed-use settlement extensions or a requirement for all larger developments to be genuinely mixed use unless otherwise justified.

21. Paragraph 78 of Scottish Planning Policy states that placemaking should promote a well-integrated mix of land uses. It is therefore appropriate for the plan to address this topic. The way it does so is aspirational and yet practical in that there are no prescriptive requirements for particular mixes of uses, only a procedural requirement for the scope for mixed use to be fully considered. This is a balanced approach for the plan to take which I find to be appropriate.

22. Mrs Nicola Hutcheon criticises Paragraph 4.38 of the proposed plan and its apparent requirement for housebuilders to provide services and facilities for the community, especially with regard to the possible impact on smaller sites. Conversely Sigma Capital Group believe the plan should state the community benefits that development can bring. It is necessary for new developments to mitigate their impacts, but this paragraph could be read as a requirement for developers to provide additional services and facilities for the wider community. This would go beyond the reasonable use of developer contributions as described in Circular 3/2012: Planning Obligations and Good Neighbour Agreements. In particular there must be a relationship between the development and the mitigation being sought, and a relationship in scale and kind to the proposed development.

23. Although this part of the plan has been rolled forward from the existing plan, there has been a renewed focus on the appropriate use of developer contributions since the approval of the structure plan, evidenced by the publication of Circulars 1/2010 and 3/2012. I therefore consider that a modification is required to clarify firstly that while new services and facilities will be required across the strategic growth areas, community facilities may not be required in every site; and secondly that requirements for services and facilities must be necessary to mitigate the impact of development.

Sport and Recreation

24. Regarding the call for this part of the plan to include a specific reference to sport and recreation, I note that this section does not attempt to list all the considerations that contribute to sustainable mixed communities. However the need for land for leisure and open space is referenced in paragraph 4.34, and opportunities for walking and cycling are mentioned in paragraphs 3.9 and 3.10. These references ought to be sufficient, given that paragraph 41 of Circular 6/2013 does not list sport and recreation as expected principal topics for strategic development plans. Fuller details on how sport and recreation provision should be integrated into the design of the strategic growth areas can more appropriately be included in local development plans and supplementary guidance. I therefore conclude that no modification to the plan is required.

Quality of Design

25. Matters of design do not have significant cross boundary implications and are not mentioned in Circular 6/2013 as expected principal topics for strategic development plans. While important, this topic is therefore principally for local development plans and supplementary guidance to address. I am therefore not attracted by the suggestions made to include further detail on this topic in the strategic development plan. I conclude that no modification is required.

Other

26. Regarding whether the plan need state that in rural areas most housing will come

forward on greenfield land, I note that the plan does contain a target for brownfield development in Aberdeen City (of 40%), so a similar approach would have been possible for Aberdeenshire. However no persuasive case has been made as to why any such approach is necessary. I therefore conclude that no modification to the plan is required.

27. Scottish Enterprise argue for the inclusion of additional text regarding the delivery of development and the efficient processing of planning applications. These matters are important but are arguably national considerations that apply to all planning authorities and do not require stating in the strategic development plan. The action programme will also have an important role in describing how the policies and proposals of the plan will be delivered. As the authority points out, the proposed plan does contain targets regarding housebuilding. There are also targets for the provision of marketable economic development land. These references effectively require the planning authorities to take action to deliver the necessary sites. I therefore conclude that no modification to the plan is required.

28. A number of representees oppose the target for 40% of new housing in Aberdeen to be on brownfield land. This matter is dealt with under Issue 12: Strategic Growth Areas – Aberdeen City.

Reporter’s recommendations:

I recommend the following modification be made:

1. Replace Paragraph 4.38 with “New development needs to focus on the creation of successful and sustainable communities. This plan will not support house-building that fails to provide the services and facilities necessary to serve the development.”

Issue 7	Quality of the Environment	
Development plan reference:	Chapter 4, Objective 4, pp 34 - 36	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Natural Environment</u> SportScotland (PP012) Scottish Natural Heritage (PP072)</p> <p><u>Historic Environment</u> Old Aberdeen Heritage Society (PP236)</p> <p><u>Renewable energy</u> Fred Olsen Renewables Ltd (PP206f)</p> <p><u>River basin management planning</u> Scottish Environment Protection Agency (PP029b)</p> <p><u>Greenbelt</u> Portlethen & District Community Council (PP086) Old Aberdeen Community Council (PP222)</p> <p><u>Green networks</u> Scottish Environment Protection Agency (PP030) Scottish Natural Heritage (PP079)</p> <p><u>Monitoring</u> Scottish Natural Heritage (PP073)</p> <p><u>Other</u> Scotia Homes (PP134) Polmuir Properties (Newtonhill) Limited (PP139)</p>		
Provision of the development plan to which the issue relates:	Objective 4 – Quality of the Environment	
Planning authority’s summary of the representation(s):		
<p><u>Natural environment</u></p> <p>PP012 – Specific reference should be made to the SPP policy intent on Local Landscape Areas and remind local development planning authorities of this.</p> <p>PP072 – Paragraph 4.29 of the plan, in highlighting the particular importance of considering the effects of potential development on Natura 2000 sites and the Cairngorms National Park, could downplay other more widespread features. Reference is given to SSSI’ and protected species. The third bullet on page 34 is not strong enough in stating that wildlife; habitats etc. will be considered throughout the planning process.</p>		

Historic environment

PP236 – There should not be an overriding presumption in favour of the Development of Aberdeen University. Such development should not be pursued at the expense of the cultural and historic heritage of Old Aberdeen Conservation Area.

Renewable energy

PP206f – It is unclear how renewable energy development will integrate into the spatial strategy, including the protection of the built, natural or cultural heritage assets of the area.

River Basin Management Planning

PP029 – There is an opportunity to improve the clarity of paragraph 4.30 by explaining what the standards of the Water Framework Directive Standards are and clarify that the first River Basin Plans for Scotland have been adopted (the second plans are already under preparation).

Greenbelt

PP086 – Paragraph 4.31 wrongly links the potential of the greenbelt to the character and landscape setting of the city.

PP222 – Disappointed that para 4.31 indicates that greenbelt is secondary to land development, despite highlighting the importance of green areas. The plan should in principle protect all designated greenbelt parklands but accept that there may be instances where green belt designation must be reconsidered.

Green Networks

PP030 – The multiple benefits that the green network can deliver are fundamental to the successful implementation of the River Basin Management Plans and objectives of sustainable flood risk management. This could be reflected more strongly in the plan.

PP079b – No definition of Green Networks in the Glossary.

Monitoring

PP073 – The enhancement of the quality of the environment should be addressed through a monitoring target.

Other

PP134, PP139 - The stated objectives are supported however it is considered that further Greenfield land releases are required to meet the stated objectives.

Modifications sought by those submitting representations:

Natural Environment

PP012 – Specific reference should be made to Local Landscape Areas.

PP072 – Paragraph 4.29 after the second sentence should be amended to read: *“Legal protection for various species and the national or international status of various designated areas must be observed by development proposals. All proposals should aim to conserve and enhance biodiversity”*.

The third of the ‘How to meet the targets’ on page 34 should be amended to read as follows: *“Both councils will seek to conserve and enhance biodiversity, wildlife habitats, protected species, landscape character, green networks and other sensitive areas (including the provision of biodiverse open space in developments) in identifying land for development, preparing masterplans and assessing development proposals”*.

Historic Environment

PP236 – Make clear in chapter 4, objective 1, para 4.5 (how to meet the targets) that there will be no strong presumption in favour of university development.

Renewable Energy

PP206f - Page 34 ('Targets') should be re-worded to read 'To make sure that development improves and does not lead to the loss of, *or have a significant adverse impact on*, built, natural or cultural heritage assets.'

River Basin Management Planning

PP029 – Amend paragraph 4.30 to read “The EU Water Framework Directive requires that all inland and coastal waters to reach good ecological status by a set deadline, not all water bodies in the area meet the required standards and so stakeholders including Local Authorities, statutory agencies and representatives of key sectors are working together to deliver the improvements set out in the River Basin Management Plan Area Action Plan required in the North East.”

Greenbelt

PP086 – Add “and neighbouring settlements” at the end of the first sentence of para 4.31.

PP222 – Revise text of para 4.31 to read “The green belt around Aberdeen will continue to play a vital role in protecting the character and landscape setting of the City. However, it may occasionally need to change to meet the growth this plan seeks to achieve this will be by exception only and with full consultation with the community. Accessible green networks within and around Aberdeen and other major settlements will also be important to achieving a high quality environment.”

Green Networks

PP030 – Amend paragraph 4.31 to read “...Accessible green network within and around Aberdeen and other major settlements will also be important to achieving a high quality environment *and supporting the delivery of the River Basin Management Planning and sustainable flood risk management objectives.*”

PP079b - Added definition of Green Networks to the Glossary on page 46: *A network of cycle paths, footpaths, open spaces, other greenspaces and habitats which link together to provide cycling and walking routes, recreational opportunities and habitat corridors for*

the movement of wildlife.

Monitoring

PP073 – The second monitoring bullet point on page 34 should be amended to:
“Assessing how development has directly or indirectly led to the improvement or loss of the built, natural and cultural assets (including better connectivity or fragmentation of the green network), by carrying out reviews through local development plans”.

Other

PP134, PP139 – Further greenfield land releases are required to meet the stated objectives.

Summary of responses (including reasons) by planning authority:

Natural Environment

PP012, PP072 – It is not the role of the SDP to remind local planning authorities of the possibility of designating Local Landscape Areas. Scottish Planning Policy already does this, as noted in the representation.

It is the intention of the plan (CC/Doc1) to outline what the key regional objectives in relation to maintaining and enhancing the quality of the environment will be. In mentioning the importance of sensitive consideration of development which may impact on Natura 2000 sites and the Cairngorm National Park, the plan states that ‘particular’ care must be taken in this direction. This is not to say that consideration should not be taken over other types of sensitive sites and this is outlined in the third ‘How to meet the targets’ on page 34, with reference to ‘other sensitive areas’. This will be considered at the LDP level when identifying development land, preparing policies land and assessing proposals.

The third ‘How to meet the targets’ in stating that “both councils will take account of biodiversity etc.” is recognising the importance of considering this within the context of sustainable development and within the wider planning process. It is not felt that changing the wording of this target will make any difference to the outcome, as all aspects need to be considered as part of a wider process.

Historic Environment

PP236 – The importance of protecting the historic urban environment is of course recognised. The proposed plan (CC/Doc1 in Chapter 4, Objective 4, para 4.28 and 4.29) outlines that it is key for new development to maintain or improve the regions built, natural and cultural assets. Para 1.9 of the plan (CC/Doc1) highlights the importance of interpreting the plan as a whole. Therefore, partnership working with the universities must also be seen within the context of protecting the regional assets, which includes the historic built environment of Aberdeen.

Renewable Energy

PP206f – The text in the Proposed SDP target has been carried forward from the current approved structure plan. It is expressed as a target (and not as a policy) and as such its

wording remains appropriate. Paragraph 4.28 directs attention to the importance of site selection and the use of high quality design as critical in mitigating potential impacts.

River Basin Management Planning

PP029 – Paragraph 4.30 is currently easy to understand and conveys the key message well. The level of detail in the proposed amendment is not required in this context and at 67 words is not written in plain English.

Greenbelt

PP086, PP222 – The map on page 5 of the plan shows the extent of the greenbelt. Although generally focussed on Aberdeen, it does extend south around the Aberdeenshire settlements of Portlethen and Newtonhill. The boundaries of the greenbelt are established through the Local Development Plan which is open to wide community consultation and engagement. The suggested amendments to the text do not add to the protection provided by the plan.

Green Networks

PP030, PP079b – A list of benefits could be added to the end of this sentence (4.31) but it is designed to be general and inclusive. It would not be appropriate to just pick out these two benefits (delivering River Basin Management Planning and sustainable flood risk management objectives) from the list which could include biodiversity, sport, recreation, active travel, education etc.

A definition of green networks is not required; however, if the Reporter feels that a definition would benefit the overall clarity of the plan, the suggested addition is acceptable, subject to Plain English.

Monitoring

PP073 – The third bullet under monitoring on page 34 of the plan (CC/Doc1) is intended to highlight that the most appropriate place to monitor effects on the built; natural and cultural assets is at the local development plan level. While this does not explicitly state that improvements will be measured, this is not to say that measures at the local level are not being put in place to actively improve the quality of environment and this is something which is highlighted throughout the text and targets within the plan. Specifically identifying green networks would undermine other important environmental assets which are not mentioned.

Other

PP134, PP139 – The release of additional greenfield housing sites is unrelated to meeting the objectives and targets of this section of the plan.

In light of the above, there is no need to make any changes to the plan as a consequence of these representations.

Reporter's conclusions:General Comment

1. While I have considered the individual merits of the matters raised under this issue, I am conscious that, with the exception of an updated statement on progress with river basin management plans and references to green networks, this part of the plan has been rolled forward from the approved structure plan without change. Given these circumstances, my approach has generally been to avoid recommending modifications unless circumstances have clearly changed. I have considered the unresolved representations on the matters set out below on that basis.

Natural Environment

2. Paragraph 139 of Scottish Planning Policy encourages the identification of local landscape areas in the development plan. While it does not say that this is necessarily a role for the strategic development plan, paragraph 140 does state that such areas may be important or valued regionally. However no representee has suggested that any particular local landscape areas in north-east Scotland might serve a strategic cross-boundary function that would bring them within the remit of the strategic development plan. I therefore agree with the authority that this is a matter for local development plans.

3. Natura 2000 sites and the Cairngorms National Park are designations which may reasonably be expected to have particular implications for strategic regional planning. For instance the landscape quality of the national park is an important asset for the wider region that could be affected by development within the strategic development plan area. Development affecting Natura 2000 sites is subject to particular stringent legal tests. I therefore conclude that it is reasonable for the plan to pick out these designations as requiring particular care, in this context of strategic planning. Local development plans are likely to have a stronger role in protecting certain other designations. Elsewhere in paragraph 4.29 the proposed plan refers to the wider need to focus on maintaining and improving biodiversity, wildlife habitats and landscape.

4. The third bullet under How to meet the targets states that both councils will “take account of” biodiversity etc. This is a broad phrase which I do not interpret as being in conflict with the biodiversity duty or the desirability to maintain and improve biodiversity. For instance the councils may take account of biodiversity by ensuring that development enhances the natural environment. The plan is to be read as a whole, and the first bullet point in this section requires local development plans to ensure that the natural environment continues to be protected and improved. Overall I conclude that this part of the plan contains sufficient safeguards for the natural environment and that no modification is required.

Historic Environment

5. The Old Aberdeen Heritage Society is concerned that text in the proposed plan could be seen as a presumption in favour of development by Aberdeen University. I do not interpret the text in the fourth bullet point on page 26 of the plan in this way. In talking about working with universities to help them make a positive contribution to the area, this wording captures something of the concern of the representee that local character should be protected. Statements in the Quality of the environment section, such as at paragraph 4.28 and in the first target, are clearly aimed at protecting heritage assets. I conclude

that no modification is required.

Renewable Energy

6. It is suggested that the first target should refer to avoiding 'significant adverse impact', rather than 'damage' to heritage assets. As a target, I consider it is appropriate for the plan to seek to avoid harm to these assets, and I therefore prefer the wording in the proposed plan.

River Basin Management Planning

7. The Scottish Environment Protection Agency suggests adding further detail on the requirements of the EU Water Framework Directive and river basin management planning. The proposed addition contains factual information that would provide further context for the plan's targets and proposals. However it would not alter the practical effect of the plan. I do not therefore consider that it is necessary. This part of the plan is largely rolled forward from the existing structure plan, but has been updated by noting that the river basin management plans have now been prepared. Overall I conclude that the text of the proposed plan is sufficient and no modification is required.

Green Belt

8. Representees seek the inclusion of references to settlements beyond the city of Aberdeen, to green belt releases being exceptional and to the need for community consultation.

9. Although the Aberdeen green belt adjoins a number of settlements, its principal relationship is to the city of Aberdeen itself. It is its role with regard to Aberdeen that is of the most cross-boundary significance, and so of most relevance to the strategic development plan. More local benefits to smaller settlements may be considered at the local development plan level where detailed boundaries are established. I therefore do not consider it essential that the plan refers to neighbouring settlements.

10. It is clear from paragraph 161 of Scottish Planning Policy that land previously designated as green belt may on occasion need to be released as part of the settlement strategy. The spatial strategy of the proposed plan is to direct at least 50% of new housebuilding to the area of Aberdeen City Council. At least a further 25% is directed to strategic growth areas outside the city boundaries, the vast majority of which is to take place within the Aberdeen housing market area, close to the city. Schedule 1 of the plan identifies that 9,000 homes will be required on new greenfield sites within the city boundaries. In these circumstances it seems likely that some existing areas of green belt will be required to accommodate this growth. I therefore conclude that the proposed plan's statement that the green belt will need to change is appropriate, and that to say that such changes would be exceptional could be misleading.

11. As paragraph 139 of Circular 6/2013: Development Planning makes clear, green belt boundaries are to be established in strategic or local development plans. Legal and national policy requirements to consult communities on these plans are well established. There is therefore no need to include a specific commitment to consult communities on green belt changes in the plan.

Green Networks

12. Green networks have a range of benefits, including as habitat networks, active travel routes and greenspace links as well as their potential role in flood risk management. I agree with the authority that it would not be appropriate to pick out one function of green networks in the plan. To enter into an extensive description of the benefits of green networks would not be in keeping with the concise nature of the rest of the plan.

13. Should a detailed definition be necessary, then an appropriate place for this would be the glossary. However there is no requirement in national policy or elsewhere to include a definition in the plan. Nor am I convinced that the wording proposed by Scottish Natural Heritage is the appropriate one. For instance it does not include the river basin management function highlighted by the Scottish Environment Protection Agency. Scottish Planning Policy does not currently contain a definition of green networks. On balance I conclude that, while there may be benefits in describing what is meant by this term in the glossary, this is a matter best left for the authority to consider at the time of the review of the plan.

Monitoring

14. Given that the relevant target of the plan is to improve built, natural and cultural assets, it is incongruous that the related monitoring activity is to assess the loss of these assets. I therefore conclude that text should be added to the plan to refer also to the monitoring of improvements to environmental assets.

15. I agree with the authority that it would not be appropriate to single out green networks as an example of the environmental assets to be assessed. The list of assets that could potentially be given would be too long to practically include in the plan. It is not necessary to provide examples, and such an approach would risk giving an unbalanced prominence to one aspect of the environment.

Other

16. Discussion of the amount of new land that is required to be released for development is included elsewhere in the plan, and is assessed elsewhere in this report. This part of the plan deals with maintaining and improving the quality of the environment. In doing so it clearly recognises that new development will occur and has the potential to affect the environment either positively or negatively. For instance, paragraph 4.31 refers to the need for the green belt to change to accommodate growth. The third bullet point under How to meet the targets refers to identifying land for development and the need to take account of environmental assets in doing so. I therefore conclude that this part of the plan appropriately sets its discussion of environmental concerns within the wider context of the plan’s spatial strategy for development. No additional references to the need for greenfield land releases are required.

Reporter’s recommendations:

I recommend that the following modification be made:

1. Replace the second bullet point under ‘Monitoring’ on page 34 of the plan with: “Assessing how development has directly or indirectly led to the improvement or loss of the built, natural or cultural assets, by carrying out reviews through local development plans.”

Issue 8	Putting This Plan Into Practice	
Development plan reference:	Chapter 5 (Pages 40 & 41) and Schedule 2	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Reflecting Circular 3/2012</u> ASDA Stores Ltd (PP020) Graham Homes Ltd (PP034a) Sandlaw Farming Ltd (PP040a) Westhill Developments (Arnhall) Ltd (PP048) Elsick Development Company (PP100b) Scotia Homes (PP104) Grandhome Trust (PP108b) Stewart Milne Homes (PP120) Dunecht Estates (PP146a) Colin & Esther Tawse (PP238a)</p> <p><u>Providing Infrastructure</u> SportScotland (PP018) Cults, Bieldside & Milltimber Community Council (PP081) Barratt East Scotland/Drum Development Company (Stonehaven) Ltd (PP192c) John McIntosh (PP196b) NHS Grampian (PP213j)</p> <p><u>Schedule 2</u> Aberdeen Science Parks LP (PP199) Aberdeen Cycle Forum (PP214d) Aberdeen International Airport (PP125c) North Kincardine Rural Community Council (PP224i) Scottish Natural Heritage (PP077, PP078) Elsick Development Company (PP100) Scottish Natural Heritage (PP077, PP078) Scottish Enterprise (PP190)</p>		
Provision of the development plan to which the issue relates:		
Planning authority's summary of the representation(s):		
<p><u>Reflecting Circular 3/2012</u></p> <p>PP020 – When seeking developer contributions the councils need to take wider pressures and viability assessments into account to ensure Aberdeen City and Shire remains a competitive location in which developers are keen to invest.</p> <p>PP034a, PP040a, PP048, PP146a – The entire section under ‘Providing Infrastructure’ needs to be reviewed to more accurately reflect Circular 3/2012. As currently worded, it places an undue burden on landowners and developers and is contrary to the Circular.</p>		

PP100b, PP108b, PP120, PP238a – Paragraph 5.10 causes concern as it is expecting the increase in land values to fund a large percentage of new infrastructure and amounts to an intention to introduce a land tax and fails to comply with Circular 3/2012.

PP104 – Any developer contributions must accord with Scottish Planning Policy and Circular 3/2012. The SDP and LDP's must take a reasonable and proportionate approach to the nature, scale and timing of developer contributions and be directly related to the nature and scale of proposals.

Providing Infrastructure

PP018 – Explicit mention of sports facilities should be made in paragraph 5.7.

PP081 – The plan does not fully bring out the importance of having the right infrastructure in place in time to accommodate a growing population. Infrastructure often lags behind, creating unnecessary congestion. Developers are generally large companies with access to finance and should provide the infrastructure when it is needed, not when it suits them.

PP192c, PP196b – The North East of Scotland is driving the Scottish economy but this fact doesn't shine through the plan. The SDP shall be obliged to secure a protocol with Key Agencies and Utilities and their capital programmes should be material considerations in planning decisions.

PP213j – It is important that the plan recognises the scale of investment required in new infrastructure to cater for the growth envisaged by the plan. Healthcare will be a part of the infrastructure requirement. Many facilities are operating beyond capacity and with greater pressure it is important to secure developer contributions are sought to mitigate the impacts. Whilst it is appreciated that the Glossary makes it clear that health care facilities fall within the wider term infrastructure reference should be made to this within the plan.

Schedule 2

PP199 – Aberdeen Energy and Innovation Parks should be specifically mentioned in relation to the Energetica initiative as an area of land that can meet these requirements.

PP214d – While welcoming the vision and aims of the plan, the plan fails to follow through with strategic thinking in relation to cycling, and includes no strategic measures to support cycling.

PP125c – No much on the Airport

PP224i - Clarification is needed. The last of the range of transport measures is '*a link over the River Dee*' which is also thus described on Page 12, Para 3.18. If that is a new ROAD bridge then it would be a very significant infrastructure project, worthy of greater prominence. If merely pedestrian, then it should be so listed.

PP077 – There are no proposals for 'green nature', or for development which would promote active travel within Schedule 2.

PP078 – There should be mention in Schedule 2, in relation to a link over the River Dee that this will be subject to further analysis through a Habitats Regulation Appraisal.

PP100 – It is not clear whether the proposals listed in Schedule 2 are to be considered the full extent of the transport measures which are to be considered to be "strategic" and as such will be paid for through the Strategic Transport Fund. There has been no debate on how these schemes have been identified and, as highlighted to the SDPA previously, some of the schemes appear to be specific to certain developments.

PP190 – Schedule 2 should be categorised, with Peterhead Port identified under 'Energetica' and Aberdeen Harbour under 'Transportation/Infrastructure' along with Fraserburgh Harbour. Reference should be made to the bids for Aberdeen Harbour and Peterhead Port to be identified as national developments under NPF3.

Modifications sought by those submitting representations:

Reflecting Circular 3/2012

PP020 – None suggested

PP034a, PP040a, PP048a, PP146a - The entire section under 'Providing Infrastructure' needs to be reviewed to more accurately reflect Circular 3/2012. As currently worded, it places an undue burden on landowners and developers and is contrary to the Circular.

PP100b, PP108b, PP238a – Paragraph 5.10 should be deleted in its entirety.

PP104 - the SDP should note the need for development contributions to accord with SPP and Circular 3/2012 and be reasonable and proportionate.

PP120 – Ensure reference is made to Circular 3/12 and the relevant tests for developer contributions to be acceptable. Delete para 5.10 of the Plan which has no legal basis. Make it clear that planning gain contributions to the NHS are not appropriate.

Providing Infrastructure

PP018 – The fourth sentence of para 5.7 should read "We will also need to invest in facilities and services for communities, including sports facilities where there is a local need".

PP081 - The following paragraph should be included under section 5 on Providing Infrastructure... "New developments will not be approved until there are clear, specific and deliverable plans in place to ensure that supporting infrastructure is available to accommodate the development. The phasing of new developments will be in line with infrastructure capacity development and developers will be expected to contribute to needed infrastructure."

PP192c, PP196b - The North East of Scotland is driving the Scottish economy but this fact doesn't shine through the plan. The SDP shall be obliged to secure a protocol with Key Agencies and Utilities and their capital programmes should be material considerations in planning decisions.

PP213j – Make explicit reference to healthcare as a form of infrastructure requirement within the main body of the plan and specifically in para 5.8.

Schedule 2

PP199 – Aberdeen Energy and Innovation Parks should be specifically mentioned in relation to the Energetica initiative as an area of land that can meet these requirements.

PP214d - Schedule 2 should include a specific commitment to the continued development of a strategic cycle network. This should be included as an extra proposal in the final bullet point.

PP125c – Bullet point seven to read "Supporting Aberdeen International Airport in the implementation of the 2013 Airport Master Plan."

PP224i - If the *link over the River Dee* is a new ROAD bridge then it would be a very significant infrastructure project, worthy of greater prominence. If merely pedestrian, then it should be so listed.

PP077 – Two more proposals should be added to schedule 2:

"Identification and establishment of green networks in and around Aberdeen and other major settlements to provide a strategic linkage of walking and cycling routes, green spaces and habitat corridors for wildlife".

"Review of the Aberdeen Green Belt so that it can continue to protect the most important areas and guide development in the strategic growth areas to appropriate places".

PP078 – The last proposal in schedule 2 should be amended to: *"a link over the River Dee (subject to satisfactory demonstration of no negative effect on the River Dee Special Area of Conservation)"*

PP100 – A new junction on the Fastlink at Chapelton of Elsick should be included in the range of transport measures required to deal with the combined effects of new development released through the SDP in Schedule 2.

PP190 – Schedule 2 should be categorised, with Peterhead Port identified under 'Energetica' and Aberdeen Harbour under 'Transportation/Infrastructure' along with Fraserburgh Harbour. Reference should be made to the bids for Aberdeen Harbour and Peterhead Port to be identified as national developments under NPF3.

Summary of responses (including reasons) by planning authority:

Reflecting Circular 3/2012

PP020, PP034a, PP040a, PP048, PP100b, PP104, PP108b, PP120, PP146a, PP238a – Circular 3/2012 was published by the Scottish Government on 14 December 2012, after the proposed SDP had been agreed but before its publication for representations.

Paragraphs 5.7, 5.8 and 5.10 of the Proposed SDP are carried forward with very little change from the current structure plan and were approved by Scottish Ministers in 2009. Circular 3/2012 did not represent such a step-change to make these inappropriate now.

Circular 3/2012 will need to be taken into account in the determination of appropriate planning obligations. However, the SDP is required to provide an overview and does not suggest that requests will be made which go beyond the limits of the Circular. The

Proposed SDP does not contain statements which are inconsistent with Circular 3/2012 or wider Scottish Government policy and there is no need to explicitly mention the Circular or the tests it contains.

Providing Infrastructure

PP018, PP081, PP192c, PP196b, PP213j – It is recognised that new development can adversely impact existing communities and such considerations are important in the preparation of local development plans (para 5.7). The plan is also clear that developers will need to accept that contributions will be required towards necessary infrastructure. However, the delivery of necessary infrastructure alongside development is challenging in the current financial climate. Planning authorities may need to be flexible on a site-by-site basis to ensure that infrastructure is provided and that impacts are managed if development is to proceed. It would not be appropriate to amend the plan in the way proposed.

The vibrancy of the local economy is stressed from the very first paragraph of the plan (para 1.1). The scale of growth contained in the Proposed SDP cannot be achieved without significant investment in essential supporting infrastructure. The Proposed Plan (para 5.10) clearly states that the public sector has a role to play in the provision of infrastructure, with over £1bn of expenditure planned over the next decade. However, this will not be sufficient and will require contributions from the private sector / landowners and developers as well. The process of justifying and securing additional public investment in the area is done in parallel with the SDP and does not require stronger links to it.

Making specific reference (in para 5.8) to healthcare as a type of infrastructure which will require developer contributions would require a reference be made to all types of infrastructure contributions, so as not to put added emphasis on any one type of developer contribution. As healthcare is already recognised within the glossary definition of infrastructure, it is not necessary to restate this. Similarly with sports facilities, there is no value to be gained from identifying just one type of facility in para 5.7.

Key Agencies and utility providers are actively engaged in the preparation of the Strategic Development Plan. While the concept and value of a 'protocol' could be explored during the preparation of the next SDP, it is not clear at this time what added value this would bring.

Schedule 2

PP077 – Proposals put forward in Schedule 2 of the plan (CC/Doc1) are anticipated projects which the SDPA are supporting and encouraging. All proposals will be subject to the aims, objectives and targets put forward in the plan, which includes themes such as green networks and the green belt. The integration and consideration of this will take place when determining proposals and applications, and therefore stand alone proposals for this are not necessary and would detract from the integrated approach the plan is seeking to achieve.

PP078 – The proposals are to be read in relation to the plan (CC/Doc1) as a whole (para 1.9). Para 5.6 states that further assessment will be required in relation to certain proposals and developments and explicitly makes reference to the River Dee Link in this context. Any future proposals will be subject to a number of statutory assessments

(including an HRA) and it is not necessary to list them all as part of the strategic proposal. Although not considered necessary, a potential mechanism to avoid repeating mitigation measures throughout the plan would be to amend paragraph 5.6 by adding the following sentence...“The Habitats Regulations Appraisal of this plan contains safeguards which will need to be applied at that stage”.

PP100 – The strategic transport schemes required as a result to the cumulative impact of new development have been identified for the first two phases of the plan and not the final phase. This additional work will be done to inform the review of the SDP. A new junction on the fastlink was not an identified project at this stage.

PP125c – The existing text is sufficient for Schedule 2, the Action Programme provides the context for delivery of the Masterplan.

PP190 – Schedule 2 already includes references to improvements at Aberdeen and Peterhead ports and there would be no value in separating them so that Peterhead can be included under an ‘Energetica’ heading. References to submissions for national development status would not be appropriate in the SDP, although both the SDPA and Scottish Enterprise made such submissions. No proposals have been submitted as to any proposals for Fraserburgh Harbour and it is unclear why this should be specifically mentioned.

PP199 – The Aberdeen Energy and Innovation Parks are existing employment sites to the north of the River Don in Aberdeen. There will be a large number of individual sites which may contribute to the Energetica initiative and it would not be appropriate to single out one for reference within the SDP.

PP214d – The commitment to exploring opportunities for a strategic walking and cycle network within the strategic growth areas and linking from Aberdeenshire into Aberdeen is contained in para 3.10 and represented graphically on pages 13, 17, 19 and 21 of the plan. This proposal is being taken forward through the active travel action plan proposed as part of the Regional Transport Strategy refresh by Nestrans. There may be value in referencing these in Schedule 2 but if anything was to be added from Paragraph 3.10 (to give the proposal added emphasis) it should be as a separate bullet in the first column where most of the transport related proposals are presented. The Strategic Transport Fund interventions have been defined through modelling work and, although cycling will be taken into account in the design of proposals, it did not form an integral part of the schemes.

PP224i – The exact nature of the ‘link over the River Dee’ proposal is still uncertain and may take a variety of forms. At the current time, detailed assessment is underway. However, it is likely to be a significant project and therefore worth identifying at the earliest opportunity. It is one of the projects required to address the cumulative impact of new development identified in the plan.

No amendments to the plan are required as a consequence of these representations.

Reporter’s conclusions:

Reflecting Circular 3/2012

1. Representees are clearly concerned that the plan may be used to extract developer

contributions that go beyond what is justifiable under the terms of Circular 3/2012: Planning Obligations and Good Neighbour Agreements. Paragraph 5.7 of the proposed plan refers to the need to invest in a range of areas, and in the case of roads, sewers and schools ties this to additional pressures brought about by new development. Paragraph 5.8 specifies that contributions will be required towards “necessary infrastructure, services and facilities” within sites and to deal with “wider effects”. This language is reflective of the necessity, planning purpose and relationship to proposed development tests in Circular 3/2012. There is no requirement to directly repeat the tests set out in Circular 3/2012 in every development plan.

2. The text of paragraphs 5.7 and 5.8 of the plan almost exactly mirrors wording used in paragraphs 5.7 and 5.8 of the approved structure plan. No significant changes in circumstance have been pointed out to me since the structure plan was approved, though the publication of Circulars 1/2010: Planning Agreements and 3/2012 indicate an ongoing national focus on the proper use of developer contributions.

3. While the emphasis of this part of the proposed plan is clearly on making a case for the payment of developer contributions, rather than defining the limits of them, I do not find that any text in this part of the plan runs contrary to the policy position set out in the circular (noting that I deal with the issue of the Strategic Transport Fund separately under Issue 9, and with the references to land value below). I therefore conclude that no modification to the plan is required.

Capturing increases in land value

4. Paragraph 5.10 of the proposed plan has been subject to particular adverse comment. This paragraph refers to securing a higher percentage of the increase in land value arising from the grant of planning permission to fund new infrastructure and create sustainable mixed communities.

5. Again I note that this passage in the plan is largely rolled forward from the existing structure plan. However, in this case the statement that a higher percentage of the increase in land value is to be secured than previously is not one that can realistically be rolled forward from plan to plan indefinitely. There have also been significant changes in economic circumstances since the structure plan was drafted.

6. Significantly, paragraph 17 of Circular 3/2012 states that planning obligations may be used to overcome or mitigate barriers to the grant of planning permission, and paragraph 20 confirms that obligations must be related in scale and kind to the proposed development. Nowhere is it indicated that there should be any relationship between the level of contribution sought and the increase in land value.

7. What should matter to the planning authority is that necessary mitigation measures are undertaken. Whether these measures are carried out directly by the developer, funded from an uplift in land value or funded from another source (e.g. income from earlier phases of development) should be immaterial. Therefore the absolute land value and the level of land value increase are largely irrelevant to the level of contribution that may be required to mitigate the impacts of a development (though if the level of, or mechanism for, contributions reached such a level as to threaten the viability of the development, that could be relevant, as referenced in paragraph 22 of the circular).

8. It would, of course, be prudent for landowners to factor in the likely extent of requirements for developer contributions when arriving at judgements as to the likely value of development land. The intention of paragraph 5.10 may be to highlight this, but this point is already adequately covered in paragraph 3.11 of the proposed plan. The creation of an apparent link between increases in land value and the funding of infrastructure is unhelpful and is not supported in national planning policy or guidance.

9. Paragraph 5.8 has already suitably established the authority's intention to gather developer contributions towards necessary infrastructure, and paragraph 5.10 does not include any policy material or other information that I consider to be essential for the delivery of the plan's vision and spatial strategy.

10. I therefore conclude that the parts of paragraph 5.10 of the proposed plan linking increased land values to infrastructure provision should be deleted.

Providing infrastructure

11. The Cults, Bielside and Milltimber Community Council express concerns that the proposed plan does not do enough to ensure that adequate infrastructure is in place to support development, and proposes additional text to strengthen this aspect of the plan. The timely delivery of appropriate infrastructure is necessary if new development is to be accommodated successfully. Paragraph 77 of Scottish Planning Policy identifies the "co-ordination of housing land release with investment in infrastructure" as a key consideration in development plan settlement strategies. The proposed plan, at paragraph 5.7, discusses the need to provide new infrastructure, and to consider this need early in the land development process. Paragraph 5.8 covers the need for developer contributions. I consider these references adequately cover the concerns raised in this representation. There will also be an important role for the action programme at both strategic and local development plan levels to set out how development and infrastructure proposals will be delivered in a co-ordinated manner, but these documents are not within the scope of this examination. Overall I conclude that the proposed plan deals adequately with this matter.

12. The idea of securing a protocol with infrastructure providers to formalise how and when capacity upgrades will be put in place may have merit. But in the absence of such an initiative, and without the agreement of the agencies involved, it is not practical to introduce such a requirement into the plan at this late stage in the plan-making process. However, the key agencies are obliged to cooperate with the authority in the preparation of the action programme. This ought to provide a suitable vehicle for achieving the co-ordination between the planning authority, developers and infrastructure providers that is sought by the representees on this topic.

13. There have been suggestions that specific mention be made of the need to invest in sports facilities and healthcare in paragraphs 5.7 or 5.8 of the plan. However it is not necessary or appropriate to include an exhaustive list of all the potential types of infrastructure that support development. As NHS Grampian and the authority have pointed out, a fuller definition of what the plan means by the term infrastructure is included in the glossary. And it would make paragraphs 5.7 and 5.8 excessively unwieldy if they were to attempt to describe all the potential types of infrastructure that could be impacted by the development proposed in the plan. Where the plan makes specific proposals for new infrastructure, these are set out in Schedule 2, and the way in which these items of infrastructure will be delivered should be described in the action

programme. Nor is there a need (as suggested in another representation) to separately note that contributions to health services will not be required; such contributions should be subject to the same policy tests as any other form of contribution. I therefore conclude that no modification is required to paragraphs 5.7 or 5.8 regarding sports facilities or healthcare.

Schedule 2

14. There have been a number of calls for new or amended references to be included in schedule 2, the list of plan proposals.

15. Aberdeen Energy and Innovation Park: the wider Energetica initiative, which includes this site, is included in schedule 2. I am persuaded by the authority's argument that it would be impractical to include all the individual sites that contribute to the Energetica initiative within the plan. No convincing reasons have been given why this site requires an individual mention. Similarly an expansion of the proposal relating to the knowledge economy, as called for in representation PP188 would involve an unnecessary level of detail.

16. Green Network: the authority argues that green networks do not need to be identified separately as proposals in the plan because they will be considered when determining proposals and applications. They imply that there is no anticipated green network project for the authority to support and encourage through a reference in schedule 2. However, paragraph 130 of Scottish Planning Policy specifically calls on development plans to identify and promote green networks in city regions. Paragraph 41 of Circular 6/2013 identifies strategic greenspace networks as one of the principal topics that strategic development plans are expected to cover. Such networks provide links across the landscape at a scale well beyond that of individual applications. In city regions such as that around Aberdeen, they may be expected to need to be coordinated across local authority boundaries. They are properly an important strategic matter that I would expect the plan to identify.

17. Green networks are not mentioned in the aims, objectives or targets of the plan, nor are they illustrated spatially. The reference on page 34 of the plan under How to meet the targets is to taking account of green networks rather than to identifying or actively delivering them. However paragraph 4.31 of the proposed plan recognises that green networks are important. Paragraph 3.10 indicates that a commitment to explore opportunities to create such networks already exists. Given these existing references, together with national policy, I conclude that a specific proposal to actively identify and deliver strategic green networks should be included in the plan. The next review of the plan will provide an opportunity to integrate the authority's thinking about green networks into the spatial strategy more fully than has been the case with the proposed plan.

18. Strategic Cycle Network: the positive references to the need to explore opportunities to put in place a strategic walking and cycling network at paragraph 3.10 of the plan are not carried through to the text in schedule 2. Given the emphasis accorded to walking and cycling by paragraph 169 of Scottish Planning Policy, which prioritises these modes ahead of public transport and other motorised travel, this is surprising. There is an imbalance in schedule 2 between the treatment of cycling and other modes. While I note the authority's argument that these cycling proposals are being taken forward through the Regional Transport Strategy, there are likely to be important links to land use change (not least the opportunity to mitigate the transport impact of new development) that would

warrant more prominence for cycling measures in the strategic development plan.

19. There is also an inconsistency in that proposed strategic walking/cycling links are shown on the diagrams illustrating some of the strategic growth areas, but are not described in schedule 2. The proposals identified in schedule 2 may be expected to be the particular focus of the authority's activity. I therefore conclude that schedule 2 should refer to the strategic cycling (and, for completeness, walking) network. This reference can be included with the green network proposal identified above to emphasise the complementarity of active travel and green network initiatives.

20. Green belt: the proposed plan discusses the Aberdeen Green Belt at paragraph 4.31. It is clear that the authority expects the green belt to remain in place, albeit with necessary adjustments to accommodate development. Beyond these adjustments, no evidence has been submitted to indicate that any proposal exists for a green belt review or that there is a particular need for such a review at this time. I do not consider the continuation in force of the existing green belt to be an active proposal such as would require inclusion in schedule 2. Given this, I see no need to modify the plan.

21. Aberdeen Airport: the amended text suggested by Aberdeen International Airport would specify that the reference in schedule 2 is to the 2013 masterplan and that the plan should support the airport in the implementation of the masterplan. In my view, the more general wording in the proposed plan would nevertheless be assumed to refer to whichever masterplan was current at the time. Issues of who is responsible for delivery are largely covered by the action programme. I note that the proposed action programme identifies Aberdeen International Airport as a lead partner in the implementation of the masterplan. In these circumstances I conclude that no modification to the plan is required.

22. Link over the River Dee: the potential new link across the River Dee appears still to be at a largely conceptual stage, with the detailed form and location for the link still to be determined. Further consultation with affected communities will be required as the proposal firms up. However, in a plan-led system it is sensible for this project to be included in the strategic development plan at this early stage to provide an appropriate statutory context for this work to continue.

23. Regarding Habitats Regulations Appraisal of the River Dee Link, the draft appraisal of the proposed plan has noted the likelihood of a significant effect. Paragraph 5.6 of the proposed plan notes the need to carry out a more detailed assessment at a later stage to demonstrate that there will be no adverse effect on the integrity of any Natura 2000 site. The authority is correct that the plan is to be read as a whole and there is thus no need to include separate references to the Habitats Regulations Appraisal of the River Dee Link at both paragraph 5.6 and schedule 2. I therefore conclude that no modification is required.

24. Regarding whether to include a new junction on the Fastlink at Chapelton of Elsieck in Schedule 2, the authority's evidence under Issue 9 is that this junction is not required before 2027, if at all. I therefore conclude that this matter can be revisited when the plan is reviewed and does not require a modification at this time.

25. Scottish Enterprise wish to see the importance of the region's ports and harbours highlighted. There are already substantial references to Aberdeen Harbour at paragraph 3.20 of the proposed plan, and to Peterhead Port at paragraph 3.27. The vital role of

ports for economic growth is highlighted at paragraph 4.5, and improving port and associated facilities at Aberdeen and Peterhead is listed among the plan's proposals in schedule 2. I therefore find that the importance of ports and harbours to the region's economic growth is adequately covered in the proposed plan. The role of Fraserburgh Harbour is not specifically referenced, but no proposals for this harbour have been brought to my attention.

26. I agree with the authority that there is no need to reference the bids made to the Scottish Government for Peterhead Port and Aberdeen Harbour to gain national development status. Such a reference would become outdated once that decision has been taken one way or the other. While there is some merit in the suggestion of categorising the proposals in schedule 2, it is not essential that this is done. In any event the proposals are largely presented in groupings already (transport, economy, energy etc.).

Reporter's recommendations:

I recommend that the following modifications be made:

1. delete paragraph 5.10 except for the phrase "although the public sector will also need to make an important contribution", which should be added to the end of paragraph 5.8; and
2. add new bullet at the start of schedule 2 to read: "Identify and develop green networks within, between and around Aberdeen and other major settlements to provide strategic greenspace, incorporating a strategic walking and cycling network and wildlife habitat corridors".

Issue 9	Strategic Transport Fund	
Development plan reference:	Chapter 5 (Page 40, para 5.8 & 5.9)	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> Nestrans (PP052)</p> <p><u>Concerns or Amendments Suggested</u> ASDA Stores Ltd (PP021) Graham Homes Ltd (PP034b) Sandlaw Farming Ltd (PP040b) Kirkwood Homes Ltd (PP094) Elsick Development Co (PP100a) Grandhome Trust (PP108a) Stewart Milne Homes (PP121) Union Square Developments Ltd (PP130) Dunecht Estates (PP146b) Drum Property Group Ltd (PP202) Aberdeen Cycle Forum (PP214b) Homes for Scotland (PP229) Colin & Esther Tawse (PP238b) Bancon Developments Ltd (PP246b)</p>		
Provision of the development plan to which the issue relates:	Putting this plan into practice	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p>PP052 – Reference to the Strategic Transport Fund in para 5.9 is welcomed. Support the creation of statutory supplementary guidance, building on the existing non-statutory guidance which is already established and operating successfully.</p> <p><u>Concerns or Amendments Suggested</u></p> <p>PP021 – There should be clearer recognition that a blanket contribution would not be required and would not be in accordance with Circular 3/2012. The plan should be clear about the circumstances when contributions will be required. The SDP should recognise that a need for new or improved services, facilities or infrastructure, relating directly to proposed developments, must be clearly identified.</p> <p>PP034b, PP040b, PP146b – Development charging proposed through Supplementary Guidance advocating a Strategic Transport Fund is unacceptable. Contributions sought from the development are unlikely to relate directly to the impacts arising from that development and as such, could be considered contrary to the principle set out in</p>		

Circular 3/2012. Strategic Transport Fund is tantamount to a “roof tax” and imposes yet another burden over and above developer contributions and is more likely to discourage rather than encourage development.

PP094 – While accepting the principle of local mitigation, contributions to fund wider impacts should not be sought unless these can be properly justified. The strategic Transport Fund is currently being applied even without statutory status, is based on an out-of-date study and is almost entirely based on projects in Aberdeen City. Its legality is questioned as there appears to be little link between contributions and infrastructure requirements. Industry concerns raised during the 2011 consultation on the guidance were ignored. This is a tax for which there is questionable legal basis.

PP100a, PP108a – It is unclear whether the existing non statutory guidance is to be carried forward. If that is the intention, previous objections to it will be maintained. The guidance needs to be available for public scrutiny through an SDP examination, in the same way that policies in Local Development Plans on developer contributions are critically examined at LDP examinations.

PP121 - Whilst we recognise the need to improve infrastructure in the North East, particularly in terms of the strategic road network we do not accept the principles of the Strategic Transport Fund (STF). The SDPA has to remain realistic about the delivery of the infrastructure required, a matter that requires significant thought, debate and testing. The figures do not give sufficient information to test the validity of each approach at this stage and we would welcome an early engagement to discuss and review and financially test any options being considered. There are significant limitations to the STF. There are still concerns from the development industry that too much reliance is being placed on contributions coming forward as part of new development which should only be used to help enable infrastructure improvements at the most local of levels. If the SDPA continue with the move towards the Strategic Transport Fund there requires to be greater clarity of detail as to how this will be implemented. Infrastructure funding needs to be looked at holistically with all other developer contributions considered and not as a stand-alone fund.

PP130 - It is essential that any requirement for further developer contributions complies fully with the requirements and policy tests set out in Scottish Government Circular 1/2010 “Planning Agreements”.

PP202 - It is fair to say that the Strategic Transport Fund (STF) has been met with mixed reviews, but the basic theory behind it makes sense. Delivery of local (off-site) transport interventions not covered by the STF, but normally paid for by the developer would benefit from a local transport fund that could help alleviate delay and ransom situations in cases of multiple ownership.

PP214b - Strategic Transport Fund’s exclusion of cycling is unacceptable. The cumulative transport impact of developments will in part be mitigated by the provision of a high quality, safe and attractive cycle network. Piecemeal developer contributions are not a satisfactory means to deliver such a network. A share of the STF would be a fair and appropriate means of supporting the delivery of a strategic cycle network.

PP229, PP246b - Do not believe that this draft Supplementary Guidance provides a clear and direct link between the individual developments within the LDP’s and the mitigation being proposed at a strategic level.

PP238b - The Strategic Transport Fund causes particular concern and further information is required so that the principle and the detail of the strategic schemes can be debated at an examination.

Modifications sought by those submitting representations:

Support - PP052 – None sought (supportive)

Concerns or Amendments Suggested

PP021 – There should be clearer recognition that a blanket contribution would not be required and would not be in accordance with Circular 3/2012. The plan should be clear about the circumstances when contributions will be required. The SDP should recognise that a need for new or improved services, facilities or infrastructure, relating directly to proposed developments, must be clearly identified.

PP034b, PP040b, PP146b – The entire section of the Plan under Providing Infrastructure requires to be reviewed to more accurately reflect Circular 3/2012. As currently worded, it places an undue burden on landowners and developers and is contrary to the terms of the Circular.

PP094 – A full and meaningful consultation on the guidance is required and the text of paragraphs 5.8 – 5.10 amended as set out below:

5.8 Developers will be expected to contribute towards necessary infrastructure, services and facilities within their own site. Contributions may also be sought from developers to deal with impacts which lie beyond the immediate development site where this has been demonstrated to be relevant.

5.9 We will consult on and prepare supplementary guidance in support of this plan. This will include all aspects of financial and developer gain contributions including education and transport projects which are needed as a result of the combined effect of new development.

5.10 New infrastructure will be funded by the public sector both local and central government and through contributions from developers and landowners as mitigation for any detrimental impacts of their developments.

PP100a – More information is required on the supplementary guidance for the principle of the guidance to be critically examined at the SDP examination.

PP108a – Insufficient evidence has been brought forward to consider the principle of any strategic contributions based scheme. All references should be deleted.

PP121 – Remove any reference to the Strategic Transport Fund as no agreed policy has been set.

PP130 – Add sentence to paragraph 5.9 to read: “The provisions of such supplementary guidance will comply fully with Scottish Government requirements regarding developer contributions as set out in Circular 1/2010”.

PP202 – The SDP should include discussion of local works associated with sites and the impact this can have on delivery of development in the SGA where requirements for local interventions can create ransom situations. In reference to providing infrastructure the SDP should open up the opportunity for a potential Local Transport Fund to be considered through future Local Development Plans and Supplementary Guidance.

PP214b - The Strategic Transport Fund should acknowledge that higher cycling levels are one way of mitigating the cumulative impact of developments and thus the development of a high quality strategic cycle network along the strategic growth corridors should be eligible for STF funding.

PP238b - Paragraph 5.9 requires more detail on the proposed STF so that further representations can be submitted and the issue debated at an examination into the Plan.

Summary of responses (including reasons) by planning authority:

Support - PP052 – Support Welcomed

Concerns or Amendments Suggested

PP021, PP034b, PP040b, PP094, PP100a, PP108a, PP121, PP130, PP146b, PP214b, PP202, PP229, PP238b, PP246b – The SDP proposes significant levels of development over the period to 2035, well in excess of what has been seen in the area before. This scale of development will have significant impacts on the transport network which will need to be mitigated if the area is to thrive economically and retain its high quality of live.

The public sector is spending well over £1bn on the transport infrastructure of Aberdeen City and Shire over the next two decades, expenditure which goes well beyond the Aberdeen Western Peripheral Route. The plan itself highlights this (para 5.10). There are limits to the resources of the public sector and it is not unreasonable for the private sector to make a contribution as well where it is required as a consequence of new development. The Strategic Transport Fund is not a mechanism to get the private sector to pay for infrastructure which should be delivered by the public sector. It is designed to provide an up-front indication of the costs of development and ensure that those costs are fairly spread out among development sites.

The current structure plan (CC/Doc2, para 5.8) highlighted the need for development to contribute towards infrastructure to mitigate its wider effects, where a range of sites in both council areas are required to contribute. Supplementary Planning Guidance on the Strategic Transport Fund (CC/Doc 18) was approved by the SDPA in late 2011 and ratified by the two councils in early 2012 and has been operational since then as non-statutory guidance. This followed extensive engagement with the development industry and two rounds of consultation on the guidance itself. The guidance has successfully been applied by both councils to a range of development sites that have come forward over the last year. As at end May 2013, contributions totalling £1,787,000 had been agreed, with £135,000 of this already paid (SuppSDP/Doc32).

It is unreasonable to suggest that there is insufficient information available about the nature of the proposed supplementary guidance. Paragraph 5.9 is clear in its focus and scope for the intended guidance and non-statutory guidance already exists which performs this function (albeit that this guidance will be reviewed).

The preparation of the SDP provides the first opportunity to introduce it as part of the development plan. There are clear legal requirements for the preparation of supplementary guidance (s22 of the Town and Country Planning (Scotland) Act 1997, as amended by the Planning etc (Scotland) Act 2006). However, it would be the intention of the SDPA to go beyond these minimum requirements. The intention would be to adopt the supplementary guidance soon after the approval of the strategic development plan in early 2014. There is no need to be explicit about this process within the plan itself.

The Cumulative Transport Appraisal (SuppSDP/Doc33) is not out-of-date as has been suggested. It was completed in July 2010 and identifies the cumulative transport implications of the new development proposed in the current structure plan and proposed SDP. The appraisal will be reviewed on a five-year cycle and be used to inform the Main Issues Report for the next SDP.

The Strategic Transport Fund is not a tax but a way of apportioning the cost of specified infrastructure between a range of development sites, based on the scale and nature of development proposed. Impacts on site viability are an important consideration but there is no attempt to place unreasonable burdens on landowners or developers – the guidance seeks to facilitate rather than prevent development.

Scottish Government Circular 3/2012 (SuppRep/Doc48) was published after the Proposed SDP had been agreed but before the period for representations. However, Circular 1/2010 (CC/Doc22) set the context for the current non-statutory guidance and there are no fundamental changes between the documents as far as their implications for the Strategic Transport Fund. There is no disagreement that the Strategic Transport Fund must operate within the policy framework set by Circular 3/2012. However, there is no need to state this explicitly in the text of the plan.

Two representations suggested expanding the scope of the mechanism to include either other infrastructure elements (such as education) or local transport interventions. While worthy of further discussion on the back of the successful operation of the Strategic Transport Fund, there are no plans to move in this direction at the current time and it would not be appropriate to make this a requirement within the text of the SDP.

The interventions required to address the cumulative transport impacts may have cycling infrastructure components but the scale of interventions required mean that significant infrastructure improvements will be required to mitigate the impacts of the new development.

In light of the above, no amendments to the plan are required as a result of these representations.

Reporter’s conclusions:

1. The Strategic Transport Fund is a proposed mechanism for the gathering of (mainly) financial contributions from developers to be spent on strategic transport projects. Non-statutory guidance regarding the Fund is already in place. The authority’s intention is to review this guidance and then adopt it as supplementary guidance following the approval of the strategic development plan.
2. Concerns have been raised regarding:
 - the level of detail the proposed plan contains regarding the Fund, including whether the

strategic development plan should be more explicit about the level of contributions, the mechanics of how payments are made and managed, and who should pay;

- the principle of the fund, and in particular the pooling of contributions in such a way that monies contributed by a developer in one part of the city-region could potentially fund transport infrastructure in another part of the area where, it is argued, no obvious mitigation of the impacts of the development would occur;
- whether the Fund will serve to discourage development by affecting site viability;
- whether contributions are being sought for the right schemes;
- how the strategic development plan should refer to the supplementary guidance;
- whether there could also be a local transport fund; and
- the treatment of cycling infrastructure.

Level of detail

3. The Strategic Transport Fund is a significant initiative, aiming to accumulate and spend an estimated £86.6 million on transport projects in the region. In doing so, it is intended to unlock the delivery of the strategic development plan's spatial strategy and so deliver significant levels of growth. Paragraph 170 of Scottish Planning Policy states that development plans should identify required new transport infrastructure, and set out the intended approach to developer contributions linked to the transport implications of a proposed development. It is therefore right that the principle of the fund should be established in the development plan. The fund operates across the areas of both Aberdeen City and Aberdeenshire, and often seeks to mitigate the impacts of development in one authority through investment in another. The fund is therefore a strategic matter that is most appropriately covered in the strategic development plan and/or in supplementary guidance connected to the strategic development plan.

4. Paragraph 139 of Circular 6/2013: Development Planning identifies as a matter that should be covered in the plan itself, and not in supplementary guidance, "items for which financial or other contributions ... will be sought, and the circumstances (locations, types of development) where they will be sought". Whereas it states that, provided there is an appropriate context in the plan, a suitable topic for supplementary guidance can be "exact levels of developer contributions or methodologies for their calculation". It is therefore appropriate for the authority to both prepare supplementary guidance regarding the Strategic Transport Fund and also to have included a contextual statement in the plan itself.

5. The section of the proposed plan dealing with the Strategic Transport Fund (paragraph 5.9) is brief, but it does establish a number of things. These are firstly that the authority will prepare supplementary guidance on the topic; secondly that the fund will be concerned with transport projects that are required as a result of development; thirdly that it will consider the combined effects of development; and fourthly the locations within which the fund will apply.

6. Regarding the use to which contributions will be put, the existing non-statutory guidance refers to a "package of defined transport projects" identified in the Cumulative Transport Assessment that the Fund is intended to deliver. The items in the list are all included (with some minor variation in wording) in Schedule 2 of the proposed plan, along with many other schemes. However in the Cumulative Transport Assessment itself this list is referred to as a "conceptual package" (section 6.2), "relatively high level options for consideration" (paragraph 6.2.2) and "by no means exhaustive" (paragraph 6.2.4). It is not therefore clear how much certainty can be ascribed to this list as representing the

schemes that will actually be delivered by the Fund. Nor is it clear from the proposed plan itself which schemes the Strategic Transport Fund is intended to deliver. However, in response to a further information request, the authority has confirmed that the projects listed under the final bullet point of schedule 2 of the proposed plan, together with Kintore Station, are those to which the Fund is intended to apply. In order to comply with paragraph 139 of Circular 6/2013 I conclude that this should be clarified in the plan, and I recommend a modification to achieve this.

7. I have considered whether the descriptions of the schemes listed in schedule 2 are sufficiently specific. It is clearly beyond the scope of a strategic development plan to provide a detailed technical specification for its transport proposals. Paragraph 41 of Circular 6/2013 states that the spatial strategies of strategic development plans “should be specific enough to limit the options available to subsequent LDPs to those that would have a broadly similar impact on other planning authorities in the SDPA; and strategic infrastructure ... networks”. This indicates that there is a limit to the level of detail that strategic development plans are expected to enter into about particular schemes. The proposed plan does broadly identify the transport interventions that are required in order to deliver the spatial strategy. In my view the proposed plan complies with national expectations in respect of the level of detail that is included about these schemes. I also note that in some cases it appears that the exact nature and location of the proposed schemes has yet to be finalised. On balance I conclude that the plan contains a sufficiently precise description of the schemes that are to be supported by the Strategic Transport Fund.

8. While Paragraph 5.9 of the proposed plan describes the locations where the Strategic Transport Fund will apply, it does not describe the types of development that will be expected to make a payment. The existing non-statutory guidance states that the authority’s intention is to seek contributions from all housing, business, industrial, retail and commercial leisure developments (subject to criteria). In response to a further information request, the authority stated that they do not currently intend to consult on any change to this position. In order to comply with paragraph 139 of Circular 6/2013 I consider that the types of development that will be expected to contribute to the Strategic Transport Fund should be stated in the plan itself, and I recommend a modification to achieve this. I note the particular concerns regarding mixed use development raised by representees in response to further information requests, but consider this to be a matter of detail that can be addressed in the supplementary guidance.

9. Subject to the two changes referred to above, I conclude that the level of detail in the plan, and the proposed use of supplementary guidance, is appropriate.

Principle of pooling contributions to fund regional infrastructure

10. Representees have questioned whether the approach of pooling contributions from developers throughout the Aberdeen Housing Market Area into a single fund is compatible with the policy tests set out for developer contributions in Circular 3/2012: Planning Obligations and Good Neighbour Agreements. In particular it has been questioned whether there is a sufficient link between the impact of individual sites and the regional infrastructure that the Fund will deliver. Some have argued that regional infrastructure should instead be funded by the Scottish Government or local authorities.

11. Paragraph 17 of Circular 3/2012 requires there to be a clear link between the development and any mitigation offered as part of the developer’s contribution. In this

case, the Cumulative Transport Appraisal demonstrates firstly that the overall growth in traffic brought about by the level of development promoted in the plan will, without mitigation, have harmful effects on the operation of the network in terms of increased journey times and congestion. Secondly it shows that a defined package of interventions will assist in mitigating these impacts at various key locations. While the interventions that have been identified at this stage have not yet been subject to detailed appraisal, design or feasibility work, they have emerged out of a process that Transport Scotland has stated (in response to a further information request) is suitably robust for this tier of plan-making. The Cumulative Transport Appraisal has been carried out by recognised professional consultants in association with Transport Scotland as well as the local authorities. I have seen no convincing evidence that would lead me to question its applicability to strategic development planning.

12. Paragraph 168 of Scottish Planning Policy refers to the potential need to address cumulative effects. Paragraph 20 of Circular 3/2012 allows planning authorities to take the cumulative impact of a number of proposed developments into account and use planning obligations to share costs proportionately. It goes on to say that an effect of such infrastructure investment may be to confer some wider community benefit but contributions should always be proportionate to the scale of the proposed development.

13. However there is a distinction to be made between sharing costs among developments which cumulatively require a particular transport investment, and the funding of a basket of measures, not all of which are relevant to every development. According to table 7.2 of the Cumulative Transport Appraisal, none of the individual development areas shown generate traffic that will make significant use of all the proposed new infrastructure. Some developments are shown as having a measurable impact on only one or two new infrastructure components. It therefore appears that the authority's intention is to gather funds from developments which may be spent on transport interventions that do not clearly and directly benefit those developments.

14. As mentioned above, paragraph 17 of Circular 3/2012 requires there to be "a clear link between the development and any mitigation offered as part of the developer's contribution". Paragraph 18 resists the use of planning obligations to extract payments not "directly related to the proposed development". Paragraph 21 states that contributions should not be used to achieve objectives "not strictly necessary to allow permission to be granted for the particular development". Finally, paragraphs 24 and 25 indicate that a developer contribution (at least through a planning obligation) would generally not be appropriate if the development would be acceptable without it. I conclude that the mechanism currently envisaged by the authority in the Strategic Transport Fund would not comply with national policy as expressed in Circular 3/2012, because the relationship between the development supplying the contribution and the infrastructure improvement to be delivered is not sufficiently clear or direct.

15. The authority argues that their proposed approach is justified because (a) the sharing of costs will mean no one development is solely liable for the cost of a specific project or delayed by its implementation, and (b) it is a simple and transparent mechanism as desired by the development industry. These are valid arguments but are not ones that are unique to Aberdeen City and Shire. They are considerations that the Scottish Ministers could have taken into account in preparing Circular 3/2012, which is an up-to-date expression of national policy. I am not therefore persuaded that a departure from national policy has been justified.

16. This examination relates to the content of the strategic development plan and not to the detailed mechanics of the Strategic Transport Fund. But paragraph 139 of Circular 6/2013 confirms that main policy principles should be established in the strategic development plan itself, as should any departures from national policy. I consider that the issue of whether contributions from across the region may be pooled into a single fund and potentially spent on infrastructure unrelated to the contributing development is a sufficiently important policy principle as to need to be established in the plan itself. This is particularly the case given my conclusion at paragraph 14 above that such an approach would be a departure from national policy.

17. Turning to the wording of paragraph 5.9, this refers to “a Strategic Transport Fund”. The use of the singular in this phrase could be taken to necessarily imply the pooling of contributions and the loss of any link between the contributing development and the infrastructure improvement. However I consider that the use of this phrase is acceptable on the basis that the authority can, within the scope set by the strategic development plan, further define the characteristics of the fund (including, for instance, whether it may be sub-divided into a number of separate accounts) in supplementary guidance. Paragraph 5.9 then refers to the funding of “transport projects which are needed as a result of the combined effect of new development”. I also find this phrase to be acceptable as it could refer to ordinary cumulative impacts as envisaged by Circular 3/2012 (where several developments jointly have an effect on a particular infrastructure component that requires to be mitigated). Where combined effects do not exist there is less need for a strategic fund, as any necessary mitigation can be secured through the normal development management process.

18. I therefore conclude that the existing wording in the proposed plan is acceptable, but requires adding to in order to address well-founded concerns that the principles of Circular 3/2012 should be adhered to. In particular, paragraph 5.9 needs to establish that the fund will only be used to gather contributions towards infrastructure improvements that are related to the developments concerned and strictly necessary in order to make any individual development acceptable in planning terms. I recommend a form of words to achieve this.

19. Regarding the question of whether investment in regional infrastructure should come from government or through developer contributions, there is no clear dividing line between the scales of infrastructure that should be funded privately or publicly. However I note the significant investment being made in the transport network of North East Scotland by Transport Scotland, as described in Paragraph 5.11 of the proposed plan. Given that the scale of new development envisaged in the spatial strategy of the plan will impact upon the regional transport network, I believe on balance that it is appropriate for developers to make some contribution to necessary upgrades.

Development viability

20. Where there are demonstrable impacts from development that require mitigation, it is reasonable for the planning authorities to seek developer contributions. But it would be counter-productive if such a requirement was so onerous as to prevent development happening. No specific evidence has been submitted to demonstrate that the Strategic Transport Fund would threaten the viability of any particular development. However, given the scale of contributions that may be sought (the current non-statutory guidance gives a range of figures around £2,000 per house) it must be possible that the viability of some developments may be affected. This possibility is touched upon at Paragraph 22 of

Circular 3/2012, which refers to the use of staged or phased payments as a potential resolution.

21. It will be the role of the forthcoming supplementary guidance to describe any exceptions or variations to the developer contribution as part of the detailed policy. I would not expect this level of detail to necessarily be included in the strategic development plan itself. In preparing that guidance, the authority will wish to address the need to maintain development viability. Furthermore, in identifying development sites in local development plans, the planning authorities could usefully satisfy themselves that the sites are viable, including taking cognisance of the impact of any requirement for developer contributions.

Schemes supported by the Strategic Transport Fund

22. I have already concluded that the package of measures that are to be supported by the Strategic Transport Fund should be clearly identified in the plan.

23. Representations have questioned whether the package of measures identified currently in the non-statutory guidance and the Cumulative Transport Appraisal is correct. In particular, if a purpose of the Fund is to support measures with a regional benefit that mitigate the impact of a range of proposals, it has been questioned whether some of the schemes are actually specific to certain developments. In response to a further information request, the authority has confirmed that the identified projects do all mitigate the impact of a range of developments. In relation to certain of the road-based schemes this view is supported by the evidence in Table 7.2 of the Cumulative Transport Appraisal which shows all the proposed infrastructure items being used by at least 2 developments. At paragraph 11 above I noted Transport Scotland's evidence that the Appraisal represented a suitably robust process for this tier of plan-making. Overall I am satisfied that the list of projects has been generated in an adequately robust way.

24. Regarding whether a new junction onto the Fastlink at Chapelton of Elsick should be included in the list of schemes to benefit from the Strategic Transport Fund, I note that this and the Loirston A90 link are the only road-based interventions identified in Table 6.2 of the Cumulative Transport Appraisal not to be included in this list. Paragraph 7.2.13 of the appraisal indicates that this scheme may provide wider benefits than solely for the Chapelton of Elsick development. However the authority's evidence is that this junction is not required before 2027, if at all. I therefore conclude that this matter can be revisited when the plan is reviewed and does not require a modification at this time.

25. One representee has noted that all but one of the projects to be supported are in the area of Aberdeen City. I see no need to give particular consideration to the distribution of transport projects between the administrative areas of Aberdeen City and Aberdeenshire. What is important is which projects are required to mitigate the impacts of the spatial strategy. Given that the road and rail networks in the city region focus on the city, I do not find it surprising that most of the interventions identified are within Aberdeen City.

Reference to supplementary guidance

26. There is clearly strong interest in the development sector in the detail of the Strategic Transport Fund, and calls for the supplementary guidance to be subject to full and meaningful consultation. The authority has commendably stated its intention to go beyond the statutory minimum requirements when it comes to consult on the guidance. It

is not appropriate for me to recommend modifications to the plan to define the form this consultation will take. The statutory requirement to consult is set out in Section 22(3) of the Town and Country Planning (Scotland) Act 1997 (as amended).

27. It has also been argued that the supplementary guidance should encompass not only the Strategic Transport Fund but also other forms of developer contribution. There may be benefits in considering the package of potential contributions together, particularly so that the cumulative impact of contributions can be assessed. But it should be possible for the planning authorities to consider these matters in the round without necessarily setting out all their requirements in one piece of guidance. The Future Infrastructure Requirements for Services (FIRS) Group provides a forum for this to happen. It is also the case that while policy around some developer contributions is best considered across the city region as a whole, other requirements may be best formulated at the level of the individual authority. Therefore I conclude that it is not necessary to modify the plan to require this supplementary guidance to be broadened in scope.

Local Transport Fund

28. A suggestion has been made that the plan should also consider local transport works that are required to provide access to sites and the potential for a local transport fund to help deliver these. I note that the authority states that it has no plans for such a fund. Also, local delivery considerations regarding individual sites are more properly a matter for local development plans. I therefore conclude that no modification to the plan is necessary.

Cycling

29. Regarding the comments from the Aberdeen Cycle Forum, it is the case that investment in cycling infrastructure may be expected to help mitigate the transport impacts of new development. Paragraph 167 of Scottish Planning Policy states that “development should be supported in locations that are accessible by...cycling..., making best use of or adding to existing networks and creating new networks”. The Strategic Transport Fund is based on evidence in the Cumulative Transport Assessment, which does not appear to have addressed cycling measures. Therefore I do not have the evidence with which to justify recommending a modification to the plan to bring cycling measures within the scope of the Strategic Transport Fund. However this is an issue which could profitably be addressed in any review of the Assessment and, in due course, of the plan.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. Amend Paragraph 5.9 to read:

“We will prepare supplementary guidance in support of this plan. This will allow (through a ‘Strategic Transport Fund’) transport projects which are needed as a result of the combined effect of new development to be funded and delivered. The transport projects that will benefit from the Fund are identified in Schedule 2. Contributions will generally be sought from housing, business, industrial, retail and commercial leisure developments in the strategic growth areas within the Aberdeen Housing Market Area, subject to detailed criteria to be set out in the supplementary guidance. Contributions will only be used to support projects that are related to the developments concerned and are necessary to

make those developments acceptable in planning terms.”

2. Amend the final bullet point of schedule 2 to read:

“The following transport measures supported through the Strategic Transport Fund to deal with the combined effect of new development on the transport network:

- a new station at Kintore;*
- [list continues as in proposed plan]”*

3. Delete *“a new station at Kintore and”* from the sixth bullet of schedule 2.

Issue 10	Spatial Strategy - General	
Development plan reference:	Spatial Strategy and Strategic Growth Areas (paras 3.1 – 3.14, p8 – 11)	Reporter: Scott Ferrie
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Settlements suitable for growth</u> Stewart Milne Homes (PP123) Taylor Wimpey/Mitchell Partnership (PP177)</p> <p><u>Inclusion within Strategic Growth Areas - Fraserburgh</u> Maitland's Furniture Store & Restaurant (PP005)</p> <p><u>Inclusion within Strategic Growth Areas - RAF Edzell</u> Carnegie Base Services (PP107)</p> <p><u>Inclusion within Strategic Growth Areas - Westhill</u> Westhill Developments (Arnhall) Ltd (PP046b, PP047b) Stewart Milne Homes (PP114, PP123b) Dunecht Estates (PP148a) Barratt East Scotland/Dunecht Estates (PP088, P0P90, PP091, PP092) Aberdeen & Grampian Chamber of Commerce (PP248b)</p> <p><u>Inclusion within Strategic Growth Areas - Western SGA</u> Kinclun Development Trust (PP183)</p> <p><u>Small Settlements in Strategic Growth Areas</u> Derek & Fiona Dawson (PP004)</p> <p><u>Public Facilities</u> NHS Grampian (PP213a, PP213c)</p> <p><u>Green Networks and Natura 2000 sites</u> Scottish Natural Heritage (PP054, PP055)</p> <p><u>Other</u> Stewart Milne Homes (PP112a)</p>		
Provision of the development plan to which the issue relates:	Spatial Strategy	
Planning authority's summary of the representation(s):		
<p><u>Settlements suitable for growth</u></p> <p>PP123 – There are a number of sustainable mixed communities worthy of further expansion and should be referenced as such through the SDP. The following settlements</p>		

are capable of accommodating significant development within Aberdeenshire, Huntly to Laurencekirk corridor and the Local Growth and Diversification Areas: Stonehaven, Portlethen, Drumoak, Pitmedden, Westhill, Newburgh, Potterton and Ellon.

PP177 – Inverurie is suitable for more growth than is allocated to it in the Aberdeenshire Local Development Plan. The SDP should increase the allowance for this strategic growth area at the expense of the Rural Housing Market Area.

Inclusion within Strategic Growth Areas – Fraserburgh

PP005 – Fraserburgh should not be excluded from the Strategic Development Plan. Stopping the plan at Peterhead lacks vision; not including Fraserburgh is unfair and will have a detrimental effect on businesses and its dwindling town centre. The town will fall into further decline if it is not included in the plan.

Inclusion within Strategic Growth Areas - RAF Edzell

PP107 – The redevelopment of the former base at RAF Edzell meets the criteria for inclusion within the southern SGA in terms of proximity to the corridor and accessibility. The sustainable mixed use settlement which is proposed at the base also meets all of the strategic objectives contained within the strategic development plan. The suitability of this brownfield site for redevelopment should be viewed against the backdrop of a severe shortage of immediately available employment land within Kincardine and Mearns. Moreover given the nature of the housing allocations which have been identified, there is also the potential for a shortage of available housing in the SGA in the short to medium term. Both of these issues could be easily addressed through the extension of the SGA to include this important brownfield site. Previous experience has shown that it is the strategic development plan which sets the boundaries of the SGAs, rather than the local development plans. We therefore advocate at this stage the inclusion of the former RAF Edzell Base within the identified development corridor.

Inclusion within Strategic Growth Areas – Westhill

PP088, P0P90, PP091, PP092 – The strategic significance and growth potential of Westhill and Kirkton of Skene should be recognised by adding a strategic growth area which includes both settlements.

PP123b – Westhill is an important strategic town in the City and Shire area and this has been demonstrated by the demand for housing and employment in the town and should be included within the Aberdeen SGA.

PP148a – Westhill benefits from a high proportion of residents who also work in the community and further provision should be made for this through increased housing and employment allocations.

PP046b, PP047b, PP248b – The absence of a strategic growth area between Aberdeen and Westhill is surprising and a significant omission from the plan.

Inclusion within Strategic Growth Areas - Western SGA

PP183 – Economic activity west of the city has increased significantly since the 2009 structure plan, in spite of the designated strategic growth areas not including this area.

The A944 and A93 should be included in the SDP key diagram due to the strategic importance of Westhill and Deeside. More opportunity for housing development west of the city should be promoted so that housing is close to employment opportunities. There is an opportunity to deliver accessible transport links.

Small Settlements within Strategic Growth Areas

PP004 – Concerns over how small settlements which fall within Strategic Growth areas will be protected. Questioning why only the A90 and A96 have been earmarked as key transport routes around which Strategic Growth Areas will be located?

Public facilities

PP213a – There should have been greater recognition to the role of community facilities in supporting strategic growth areas and the ability of the existing public facilities to support existing, new and expanded communities. The level of growth will require significant investment in health care facilities throughout the region, in order to maintain high levels of service for an aging population. Suitable sites will need to be identified to ensure that the physical infrastructure is adequate as well as human resources being available in the areas to operate new facilities.

PP213c – The spatial strategy should provide more clarity and certainty in relation to where new homes, businesses and other developments are to be located. This is important to allow long term certainty and confidence for communities, businesses and service providers, such as NHS Grampian. The Spatial Strategy fails to provide this, especially in relation to local growth and diversification areas, this lack of clarity is present in Schedule 1 (CC/Doc1) page 42. The concern in relation to lack of early coordination could mean that NHS Grampian are unable to proactively plan for and provide increased/new health care facilities. Insufficient or untimely data does not allow the service to adequately meet its aims or budget successfully for an increased population. The SDP timeframe is such that it enables providers (such as NHS Grampian) to plan for the long term growth in the locations envisaged.

Green Networks and Natura 2000 sites

PP054 – Further emphasis needs to be made within the chapter on Strategic Growth areas in relation to strategic action to protect European designated sites.

PP055 – The role of green networks should be emphasised more within the chapter on Strategic Growth Areas to avoid them becoming an afterthought or 'add on' to development at the more advanced stages.

Other

PP112a – Concerned with the lack of strategic guidance in relation to the location of development in line with Scottish Planning Policy and the need to focus on the sustainable expansion of existing settlements and utilise existing infrastructure. The Aberdeen City and Shire Structure Plan (2009) left too much for the LDPs to consider. This is not what was expected from the recent planning reforms.

Modifications sought by those submitting representations:

Settlements suitable for growth

PP123 – Specific mention should be made in the Strategic Development Plan of the following settlements which are suitable for expansion: Stonehaven, Portlethen, Drumoak, Pitmedden, Westhill, Newburgh, Potterton and Ellon

PP177 – The SDP should increase the allowance for the Inverurie strategic growth area at the expense of the Rural Housing Market Area.

Inclusion within Strategic Growth Areas – Fraserburgh

PP005 – Extend the strategic growth area to include northerly towns such as Fraserburgh. Suggestion that Mintlaw should also be included.

Inclusion within Strategic Growth Areas - RAF Edzell

PP107 - Modification of detailed diagram - Area 4 on page 21 to include the former airbase at RAF Edzell.

Modification to paragraph 3.36 to include reference to redevelopment of the former base. Suggested additional text at end of the paragraph includes: "The former RAF Edzell Airbase represents a significant brownfield development opportunity for both housing and employment land."

Inclusion within Strategic Growth Areas – Westhill

PP46b, PP47b, PP123b, PP248b – The Aberdeen to Westhill corridor should be identified as a strategic growth area.

PP148 - Westhill requires to be identified as falling within a Strategic Growth Area and benefit from significant housing and employment land allocations.

PP088, P0P90, PP091, PP092 – Westhill and Kirkton of Skene should be designated as a strategic growth area, with consequential changes to the text, various diagrams and Schedule 1.

Inclusion within Strategic Growth Areas - Western SGA

PP183 – Include a western Strategic Growth Area based upon the A944/A93 as far as Banchory and including Westhill and lower Deeside on the key diagram. Support and direct public transport improvements in a western Strategic Growth Area and allocate a generous housing allowance in this corridor.

Small Settlements within Strategic Growth Areas

PP004 – Modification sought to include other ‘A’ roads in SGA’s or explicitly state why they have been excluded. While it is stated that 75% of all growth within the region will take place in Strategic Growth Areas – can this be expanded on to make clear that this will only apply to larger settlements and that small rural villages will be protected.

Public facilities

PP213a – There should be inclusion of such public facilities should be identified and located centrally to the community to which it serves and be visible, accessible by various modes and in particular public transport

PP213c – Specific reference should be provided in para 3.5 and 3.10 of the plan (CC/Doc1) to the need for the provision of health care facilities. Further reference should be made to this within the text for Strategic Growth Areas and Local Growth and Diversification Areas. Within The Aberdeen to Huntly SGA, specific mention should be made to the expanded remit of Inverurie Hospital, which will encompass new and expanded services.

Green Networks and Natura 2000 sites

PP054 – additional paragraph between 3.13 and 3.14... *“There are a number of Natura 2000 sites within close to or linked to the four strategic growth areas. We must ensure that the development focused in these areas has no negative effects on these sites or their species, such as because of increased recreational pressure. Development that is likely to have a negative effect on any Natura 2000 site will not be supported by this plan”.*

PP055 – Last 2 sentences of paragraph 3.10 to be amended to: *“We should do this in a way which creates opportunities for the improvement of the natural environment by linking habitats, species and open space in green networks. New tree planting could play an important role in delivering these networks, which should be identified, protected and enhanced at the same time as the built environment”.*

Other

PP112a – Add a policy requiring LDPs to prioritise development allocations as sustainable expansions of existing settlements, especially where there is existing infrastructure provision.

Summary of responses (including reasons) by planning authority:

Settlements suitable for growth

PP123, PP177 – The SDP does not identify individual settlements for development but uses the ‘housing allowance areas’ set out on page 43 of the plan. It is the role of the local development plan to determine the scale of growth appropriate to individual settlements within this strategic context. Issues around the balance of allowances between the two Housing Market Areas are addressed in Issue 5. The Inverurie-Blackburn Strategic Growth Area is already identified for effective supply plus allowances of over 7,500 homes over the period of the plan and no justification is provided as to why this is insufficient.

Inclusion within Strategic Growth Areas – General

The proposed SDP makes it clear that significant growth is focused in a limited number of places due to the need for considerable investment in public infrastructure (para 3.5). There is not the capital and particularly revenue funding available to spread the growth

more thinly – either by increasing the allowances or expanding the strategic growth areas. In particular, the spatial strategy (which is carried forward from the current structure plan) was subject to wide consultation and engagement with communities and has only just started to be implemented through the two local development plans (adopted in 2012). It is too early to start making changes to it, particularly when there is no strategic need for new housing or employment allowances (see issues 3 and 5). No detailed transport modelling has been carried out to assess the implications and transport interventions required to support additional levels of growth over a wider geographical area. Such modelling would be necessary to inform amendments to the Strategic Transport Fund.

Inclusion within Strategic Growth Areas – Fraserburgh

PP005 – Fraserburgh is not excluded from the SDP and the plan recognises the importance of development within this area. Fraserburgh is identified in the plan (CC/Doc 1) in paragraph 3.41 p22 as a local growth and diversification area. It is also identified as a regeneration priority area in paragraph 3.47 p23. Fraserburgh’s designation within the plan as a regeneration priority area highlights the current challenges and opportunities identified for the town, many of which Mr Maitland outlines in his response.

Fraserburgh will be the focus of considerable growth and development over the next few years. Aberdeenshire Local Development Plan (CC/Doc 3) in Schedule 1, Table 1 p52 outlines that the M1 site in Fraserburgh has allocations for up to 600 new houses (this includes 200 houses carried forward from the previous LDP) over the period to 2023. The H2 site has allocations for up to 590 new houses (136 carried forward from the previous plan). Schedule 2, Table 2 p58 (of CC/Doc 3) outlines that the E1 and M1 sites combined have the potential to provide up to 20.5 hectares of employment land in Fraserburgh over the period to 2023.

Fraserburgh is not identified within a strategic growth area; this is because the town does not offer the same strategic opportunities as some of the alternative locations. Including Fraserburgh within a strategic growth area would not most appropriately address the key challenges and opportunities within the area and its designation as a regeneration priority area would seem appropriate at this point in time.

Mintlaw is included in the plan as an area of local growth and diversification, an appropriate designation given its location and its scale of future growth requirements. Schedule 1, Table 3 pp 53 and Schedule 2, Table 3 pp 59 in the Aberdeenshire Local Development Plan (CC/Doc 3) outlines that considerable housing and employment land has been allocated in Mintlaw over the period to 2023.

Inclusion within Strategic Growth Areas - RAF Edzell

PP107 – Paragraph 3.8 of the Proposed SDP indicates that the strategic growth areas should be relatively narrow, up to around 5km wide. The reason for this is to make housing, employment and services highly accessible by public transport. The former RAF Edzell airbase is substantially outwith this zone, to the north of the A90 on the border with Angus Council (within 1km). RAF Edzell is clearly outwith the Strategic Growth Area, both because of its distance from the A90 but also because the diagrams contained in the plan clearly establish that the SGA does not extend as far as the border with Angus (see diagrams on pages 11 and 21).

The Aberdeenshire Local Development Plan made a substantial allocation to RAF Edzell, even though it is in an area for Local Growth and Diversification. Aberdeenshire Council approved the masterplan for RAF Edzell earlier this year, but only on the basis of the allocations for 300 homes set out in the Aberdeenshire LDP. Aberdeenshire Council also expressed a willingness to grant planning permission in principle for this allocation earlier this year.

Angus Council have expressed concerns about the impact of large-scale development at RAF Edzell on the adjacent towns in Angus, while Tactran (PP006) identified the weakness of public transport in this area. The Aberdeenshire LDP allocates land at Laurencekirk which has shops, schools, services and a recently re-opened train station, all of which can be supported by the allocation of new development (both residential and employment land). Extending the SGA to RAF Edzell would lead to less sustainable settlement pattern and significantly compromise the ability to deliver the road improvements required on the A90 at Laurencekirk. Whereas the SDP aims for reduce the need to travel and make walking, cycling and public transport attractive choices (aim 6, page 6), this is not the same as “ensuring that satisfactory public transport links are formed” (Doc c, para 5.3). RAF Edzell is an inherently less sustainable location than Laurencekirk for substantial new development and would not be consistent with meeting the aims and objectives of the plan.

There is no shortfall of either housing or employment sites in the southern SGA. The 2011 Employment Land Audit didn't include the sites coming through the Aberdeenshire Local Plan at the time and the 2013 Housing Land Audit is likely to evidence a healthy supply for many years to come due to the generous supply included within the plan.

The previous structure plan and this proposed SDP do not identify new sites for development. Paragraph 3.1 of the proposed SDP makes it clear that, while setting a clear direction and being specific where necessary, local development plans are given the opportunity to respond to local circumstances.

Inclusion within Strategic Growth Areas – Westhill (and Western SGA)

PP046b, PP047b, PP088, PP090, PP091, PP092, PP114, PP123b, PP183, PP248b – Westhill has seen substantial growth over recent years on the back of the previous plans, including the Aberdeenshire Local Plan (2006). Westhill grew at a time when housing and employment allocations in Aberdeen itself were limited. This is now no longer the case, with a substantial supply of both. Indeed, substantial residential and employment allocations have been made by Aberdeen City Council within the A944 corridor at Kingswells (which includes 50Ha of employment land which is currently under construction as well as housing) and 2,500 houses and further employment land at Countesswells. Substantial allocations have therefore been made in close proximity (2-3 miles) of Westhill.

There is no strategic need for additional housing or employment allocations beyond those made in the current structure plan and carried forward into the proposed SDP (see Issues 3 and 5).

The SDP seeks the creation of sustainable mixed communities, balancing residential and employment allowances in such a way as to reduce the need to travel and create vibrant places. Westhill still has capacity to grow on the back of existing allocations and permissions for both residential and employment land. However, it is important that

employment uses are directed to new and expanding communities rather than creating dormitory extensions of the built-up area. This will not be facilitated by further employment allocations beyond the existing generous supply.

The Westhill Capacity Study (2008) was part of an assessment throughout the largest towns in Aberdeenshire to identify the opportunities and constraints with development scenarios for up to doubling their size. In no way did this imply that either such a scenario was either desirable or achievable.

A similar proposal to the one currently being promoted at Kirkton of Skene was put forward around a decade ago and subsequent considered at a public inquiry following refusal of a planning application. It was rejected for a range of reasons but including its impact on the separation between the two communities of Westhill and Kirkton of Skene.

A few representations suggest extending a strategic growth area at Westhill out as far as Banchory and Alford. However, the A93 and A944 do not form one coherent corridor in the way that the other strategic growth areas in Aberdeenshire do. Extending the strategic growth areas in this way would effectively mean that all the towns of any substantial size (other than those on the north coast) were included within a strategic growth area. There is no need or justification for such a change and it would run counter to the need to focus development as stated in paragraph 3.5 of the proposed SDP.

Small Settlements within Strategic Growth Areas

PP004 – The A90 and A96 are the main focus of the SGA's as they are the main strategic transport routes running through Aberdeenshire and in and out of Aberdeen. These routes are also going to be a large part of the focus in terms of development of the AWPR.

The importance of protecting the integrity of small rural settlements is of course recognised. The plan (CC/Doc 1) states in paragraph 3.13 (p10) that an important aspect of the SGA's will be to focus on sustainable mixed communities. Objective 4: Sustainable Mixed Communities of the plan (CC/Doc1) in paragraph 4.37 p36 states that brownfield sites will be given development priority and para 4.35 states that new homes are to be designed to a high standard and are to respect and improve the existing qualities of the area. It is not the SDP's place to explicitly state which settlement sites will or will not be included within SGA's as this (as the plan states in para 3.8) is to be decided at the local development plan level.

Public Facilities

PP213a, PP213c – The plan adequately covers the need for infrastructure to support new and expanded communities, primarily under the 'sustainable mixed communities' objective (such as para 4.34 and 3.38). Healthcare services are specifically identified in the glossary definition of infrastructure (p47). It is the role of the Local Development Plan to be site-specific in the allocation of land for new development. It would not be appropriate for the SDP to go down to this level of detail. Land for the period to 2027 is identified in the two LDPs and this is the appropriate context to consider the detail of healthcare requirements. The two councils run 'Future Infrastructure Requirements for Services' groups and the NHS is an active participant in the process of assessing the implications of individual land allocations.

Green Networks and Natura 2000 sites

PP054 - As is stated in SNH's response the European sites have been identified in the HRA. Chapter 4, objective 4, para 4.29 of the plan (CC/Doc1) states that care must be taken over any potential effects on Natura 2000 sites. The plan in chapter 1, para 1.9 states that recognising the link between different parts of the plan is integral. The emphasis is on the plan being read as a whole, this minimises the need for repetition and continuous cross referencing. This in mind, chapter 5, para 5.6 (of the plan) states that an HRA has been carried out and that further and more detailed assessments will be required at later LDP/ project level stages to demonstrate that development will not have adverse effects on the integrity of any Natura 2000 site. Given SDP's are designed to be concise visionary documents (Circular 1/2009, para 14), it would not be appropriate to make reference, throughout different parts of the plan, to something which is already stated.

PP055 - Objective 6 page 38 – 39 outlines the plan's (CC/Doc1) commitment to promoting and encouraging walking and cycling. As mentioned in the representation, para 3.10 of the plan highlights that within Strategic Growth Areas there are opportunities to put in place a strategic walking/ cycling network which build on the current network and this is a proposal currently being taken forward through the Regional Transport Strategy refresh and the proposed Active Travel Action Plan. As part of this proposal, 3.10 also highlights that green networks should be incorporated, where possible, into such routes. Early consideration to this will be given throughout the development of all SGA's and through the local development plan. Paragraph 3.40 highlights the important role additional tree planting will play in achieving community, environmental and economic benefits and furthermore the role this will play in contributing to the wider green networks. The draft Action Programme highlights the actions relating to green networks in actions: 18, 35, 47, 55, 56, 93 and 141.

Other

PP112a – One of the roles of the strategic development plan is to provide a strategic framework within which LDPs can be prepared. However, it is not their role to be unnecessarily prescriptive but retain a strategic focus (proposed SDP, para 3.1). The allocation of sites is appropriately a matter for LDPs within the context set by the SDP strategy. A wide range of factors need to be taken into account in such decisions. Scottish Planning Policy already provides a strong framework for such decisions and there is nothing additional that the SDP needs to add to this. This was particularly important in the current structure plan given the scale of allocations which had to be made in the current LDPs. The proposed SDP does not require any additional allocations for the period to 2026 beyond those already identified.

In light of the above, there is no need to make any modifications to the proposed SDP in response to these representations.

Reporter's conclusions:

1. I note that the spatial strategy established in the current structure plan is at a relatively early stage in its implementation. Both local development plans implementing the spatial strategy (established in the structure plan) were adopted as recently as 2012. I agree with the authority in general terms that it ought to be afforded reasonable opportunity to take effect. I have found under Issues 3 and 5 that there is no strategic

need for significantly increased allowances of housing and employment land. Within that overall context I now turn to consider detailed representations on the spatial strategy.

Settlements suitable for growth

2. A number of settlements are contended to have the capacity to accommodate significant growth over the plan period. The proposed plan allocates housing allowances to those broader areas set out in Schedule 1 of the proposed plan, rather than to individual settlements. That approach is rolled forward from the current structure plan. I have no evidence before me of any material change in circumstances which would justify allocating allowances to specified settlements. I agree with the authority that local development plans will be better placed to determine the scale of growth appropriate to particular settlements, based on a detailed assessment of local characteristics.

3. I note that Schedule 1 allocates 7,500 units to the Aberdeen – Huntly Strategic Growth Area (SGA), in addition to the effective land supply. A total of 6,500 units of that allocation is to be directed to that part of the SGA within the Aberdeen Housing Market Area, where Inverurie is located. It will be for the local development plan to allocate that allowance to specific settlements. I have insufficient information to safely conclude that the allowance ought to be re-allocated within the SGA, or from elsewhere into the SGA.

Inclusion within Strategic Growth Areas – Fraserburgh

4. I take the reference to the exclusion of Fraserburgh from the proposed plan to mean exclusion from the Aberdeen to Peterhead SGA. Fraserburgh is instead located within the Local growth and diversification area. Paragraph 3.41 of the plan recognizes the need to improve road links to the northern coastal communities such as Fraserburgh, in order to support the economic growth and regeneration of the area.

5. Significantly, the town is also included within the northern Regeneration priority area. The relevant part of the proposed plan (set out on page 23) acknowledges the importance of regeneration to addressing inequalities over the plan area. Regeneration is to be focussed on the needs of existing communities, and the plan specifically refers to Fraserburgh in this regard. Paragraph 3.47 identifies a need for the economy, environmental quality, accessibility, employment opportunities and the competitiveness of businesses to be improved in such communities. The authority refers to specific allocations in the adopted Aberdeenshire Local Development Plan which I agree indicate a significant level of commitment to the development of the town, as well as at Mintlaw which is also referred to in the representation.

6. I find that the proposed plan establishes a suitable framework for the ongoing regeneration of Fraserburgh. That would not be enhanced by the significant extension of the SGA northwards, which instead would be likely to dilute the effectiveness of both designations.

Inclusion within Strategic Growth Areas - RAF Edzell

7. Paragraph 3.8 of the proposed plan advises that, in the interests of accessibility, the SGAs will be “relatively narrow, up to around 5km wide. However, the Aberdeenshire Local Development Plan will decide which settlements and sites are within a strategic growth area.” The flexibility to do so is clearly limited, based on the authority’s response to this representation, which indicates that the former RAF Edzell base is substantially

outwith the SGA. That is consistent with the conclusions of the examination into the Aberdeenshire Local Development Plan, which the representee refers me to.

8. The detailed diagram for the Aberdeen to Laurencekirk Strategic Growth Area shows the SGA terminating just to the south of Laurencekirk, well to the north-east of Edzell. I find that the extent of the SGA would have to be modified in the proposed plan, for there to be any chance of this site being designated within the SGA in the next iteration of the Aberdeenshire Local Development Plan.

9. As to the benefits of doing so, the site is said to be within 2.2 kilometres of the A90, within the theoretical 5 kilometre strategic growth area width. Discussions with public transport providers have been undertaken. There is said to be scope for very significant employment opportunities, and progress in this regard is contrasted favourably to the few employment land opportunities elsewhere within the Kincardine and Mearns area. Development of the site for housing would also lessen the reliance on a few large greenfield releases elsewhere within the SGA.

10. I note that the site is allocated in the adopted Aberdeenshire Local Development Plan for a mixed use development of up to 300 houses, together with employment land. The authority advises that the Aberdeenshire Local Development Plan allocates significant housing and employment land at Laurencekirk, which benefits from a much wider range of local services than are available at Edzell, together with a re-opened rail station. Those allocations at Laurencekirk clearly have the opportunity to support the maintenance and enhancement of local services.

11. I conclude that, in the context of no strategic shortfall in housing or employment land in the southern SGA, there is no strategic justification for the extension of the SGA to encompass Edzell. It seems to me also that strategic-scale development at that location would not have the same sustainability advantages as similar-scaled development at Laurencekirk. That is not to say that the next iteration of the Aberdeenshire Local Development Plan cannot, as the adopted version does, provide for a scale of development at Edzell commensurate with its location within the Local growth and diversification area.

Inclusion within Strategic Growth Areas – Westhill (and Western SGA)

12. Westhill is not located within a strategic growth area as designated in the current structure plan; nor is it in the proposed plan. I consider that circumstances would need to have clearly changed since approval of the structure plan if I am to recommend that Westhill (possibly also including Kirkton of Skene) be brought within the boundaries of a currently proposed or new SGA.

13. I have carefully considered those representations seeking such a change, and consider the principle arguments in favour of doing so to be as follows. Westhill has clearly seen significant growth in recent years. It provides a mix of housing and employment opportunities and there appears to be demand for further such provision. There is said to be considerable opportunity for development of a sub-sea centre of excellence, building on existing strengths. The Westhill Capacity Study considered the implications of significant expansion of the settlement. The AWPR, when developed, would be in close proximity and would considerably improve accessibility.

14. I agree with representees that Westhill is in a somewhat anomalous position of, for a settlement of its size in fairly close proximity to the city, being excluded from a strategic growth area.

15. I have found under Issues 3 and 5 that there is no strategic need for further housing or employment land allocations beyond those provided for in the proposed plan. In this context I note the authority's contention that the significant expansion of Westhill took place at a time when such development opportunities within Aberdeen itself were limited. This is no longer the case, with significant allocations being brought forward within the A944 corridor at Kingswells and at Countesswells. I consider that significant expansion at those locations would represent a better fit with the spatial strategy and sustainability objectives of the plan than would be the case at Westhill.

16. The allocation of housing and employment land allocations to specific settlements and sites is rightly a matter for the local development plans. However, any recommendation to bring Westhill within a strategic growth area would necessarily come at the expense of reduced allocations elsewhere. On the basis of the evidence before me and for the reasons set out above, I am not convinced that such a modification is necessary or justified.

17. As I have found that there is insufficient strategic justification to extend the SGA to include Westhill (or to designate a new SGA), I consider that any extension of a strategic growth corridor to Banchory, incorporating Westhill and Lower Deeside, is not justified. As would be the case with any extension of the northern SGA to Fraserburgh, such an extension would tend to dilute the effectiveness of the spatial strategy and would not be in the interests of sustainability.

18. For the avoidance of doubt, I confirm that I have considered those points made under representation PP093, which the authority inadvertently omitted from this Issue.

Small Settlements within Strategic Growth Areas

19. I well understand that residents of small villages within strategic growth areas would be concerned to protect the character of such locations. It would not, however, be in accord with the spatial strategy to designate further SGAs along other key transport routes in order that strategic-scale development be more evenly spread throughout the plan area.

20. Paragraph 3.8 of the proposed plan rightly states that it will be for the local development plans to decide which settlements and sites are to be located within SGAs, within the context established in the strategic development plan. Those lower-level but more detailed plans can more appropriately ensure that any development allocations in small communities are commensurate with their scale, range of facilities and character. I am satisfied that sufficient safeguards exist within the proposed plan, and particularly at paragraph 3.13, which states that the focus within the SGAs should be on creating sustainable mixed communities with the necessary services, facilities and infrastructure.

Public Facilities

21. I am satisfied that the proposed plan establishes an appropriate context for the provision of public services to meet the needs of the strategic-scale growth proposed by the plan. It is entirely consistent with Scottish Planning Policy to plan for the provision of

infrastructure in support of strategic growth. I note in this regard that healthcare facilities are specifically included in the glossary definition of infrastructure. Paragraphs 4.34 and 4.38 also require a focus on the provision of sustainable mixed communities, including healthcare facilities, and state that such facilities must be provided as part of the development of the strategic growth areas.

22. Within that context and at a more detailed level, it will be for the local development plans to provide for the identification of appropriate sites, working in tandem with infrastructure providers, including NHS Grampian.

Green Networks and Natura 2000 sites

23. Paragraph 1.9 advises that the plan should be read as a whole. That is consistent with the requirement of paragraph 41 of Circular 6/2013 that strategic development plans are to be concise visionary documents.

24. Paragraph 5.6 of the proposed plan states that a Habitats Regulations Appraisal has been carried out but that more detailed assessment will be required at local development plan stage, and for certain developments, to ensure that there is no adverse effect on the integrity of any Natura 2000 site. There is, therefore, no need to re-state that requirement in the Strategic growth areas section of the plan.

25. Paragraph 41 of Circular 6/2013 indicates that strategic greenspace networks are expected to be a principal topic for strategic development plans. It is recommended under Issue 8 that an additional proposal relating to green networks be inserted into Schedule 2 of the plan. In addition, I agree with SNH that paragraph 3.10 ought to be amended in order to: adequately reflect the role of such strategic networks in linking open spaces; and ensure that development of those networks is considered as an integral part of planning for the strategic growth areas.

Other

26. Paragraph 41 of Circular 6/2013 requires that strategic development plans provide a locational strategy for new development. They may be site specific “especially where there are no realistic alternative sites”, but there is no requirement that they be so. Those requirements of paragraph 77 of Scottish Planning Policy quoted in representation PP112 refer to the settlement strategy to be provided within the development plan, not just one part of it. I am satisfied that the proposed plan establishes an appropriate strategic-level settlement strategy which can be further, and more appropriately, developed at local development plan stage.

Reporter’s recommendations:

I recommend that the following modification be made:

1. Amend paragraph 3.10 to read as follows:

“As an integral part of planning for the strategic growth areas, we should explore opportunities to put in place a strategic walking and cycle network which builds on the current networks being developed in Aberdeen and Aberdeenshire towns by linking these together. We should do this in a way which creates opportunities for improvements to the natural environment by linking habitats, species and open space in green networks. New tree-planting could play an important role in delivering these networks.”

Issue 11	Strategic Growth Areas - Active Travel	
Development plan reference:	Chapter 3, SGA's page 10 - 21	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scottish Natural Heritage (PP057, PP058, PP059, PP060, PP061, PP062, PP076) Aberdeen Cycle Forum (PP214b) SportScotland (PP007)</p>		
Provision of the development plan to which the issue relates:	Chapter 3 - Strategic Growth Areas	
Planning authority's summary of the representation(s):		
<p>PP057 – The proposals diagram for Aberdeen City on page 13 should include symbols for 'existing green' specifically relating to Aberdeen Greenbelt and the Deeside Way.</p> <p>PP058 – The key diagram on page 41 of the plan (CC/Doc1) should include provision for green networks as an extension of the strategic walking/ cycling links. A further 'green' symbol should be added for the Aberdeen City Greenbelt.</p> <p>PP059, PP061, PP062 – There should be reference in para 3.29, 3.32 and 3.33 of the plan (CC/Doc1) to how the various proposals for road improvements and upgrades will be linked to the strategic walking/ cycling network shown on the detailed diagrams on page 17 and 19. The detailed diagram on page 21 of the plan (CC/Doc1) should have a 'proposed green' symbol showing strategic walking/ cycling link which includes green network hubs.</p> <p>PP060 – The 'green' symbol on proposals diagram 2 (page 17) should show the strategic walking/ cycling link as proposed not existing. The existing 'green' walking/cycling route in the form of the Formartine and Buchan Way should be shown.</p> <p>PP076 – Walking and cycling should be encouraged through locating development so that it is accessible for existing walking and cycling networks and taking the opportunity to incorporate new walking and cycling routes.</p> <p>PP214b – Concerned that the plan does not follow through its commitment in the aims of the plan to cycling, a failure of strategic thinking in relation to cycling. No strategic measures to support cycling or strategic cycling schemes (in Schedule 2). The plan plays lip service to cycling.</p> <p>PP007 – It should be made clear that the strategic walking cycling networks within Strategic Growth Areas are to be used for sports and recreation as well as active travel. Explicit reference to this should be made in para 3.10.</p>		

Modifications sought by those submitting representations:

PP057 – The Detailed Diagram for Aberdeen City, page 13 should indicate under ‘existing green’: The Aberdeen Greenbelt and the Deeside Way.

PP058 – In the key for detailed diagrams (page 49) of the plan (CC/Doc1) the ‘green’ symbol should be amended to *“Strategic walking/ cycling links – green network hubs”*. A symbol should be added to the key in respect of Aberdeen City Greenbelt.

PP059 – A new sentence added at the end of 3.29: *“Attractive routes for walking and cycling should be in place”*.

PP060 - The detailed diagram, page 17 of the plan (CC/Doc1) should show as an ‘existing green’ facility the Formartine and Buchan Way.

The solid green line on page 17, should be changed from an ‘existing green’ strategic walking/cycling link to a proposed, identified with a dashed green line.

PP061 – New sentence at the end of 3.32: *“Strategic cycling and walking routes should be provided, linking communities to each other and to other focal points”*.

PP062 – Include a strategic walking/ cycling link which makes provision for green network hubs within SGA 4 – Aberdeen To Laurencekirk (page 21).

PP076 – Para 4.44 of the plan (C/Doc1) should be amended to read: *“Walking and cycling routes are the most environmentally friendly forms of transport and should also be encouraged as this will help to achieve important health, social and environmental benefits. Green Networks within and around Aberdeen and other major settlements can incorporate strategic cycling and walking routes. The location of large housing, employment and service developments should aim to facilitate walking and cycling by being linked to walking and cycling routes around the area and by promoting walking and cycling within the area”*.

New ‘how to meet the targets on page 39: *“Green Networks will be identified within the strategic growth areas to provide attractive cycling and walking routes that can link to provide longer distance travel opportunities”*.

PP214b – The SDP should commit to the development of high quality, continuous cycle routes along the strategic growth corridors. This will enable and encourage cycle connectivity between developments along the corridors, as well as connectivity with Aberdeen City. A cycle network that is safe and attractive to use, will be well used. The SDP should be making an explicit commitment to support the development of such a strategic network.

PP007 – Reference to strategic walking cycling networks should be clear that the network is for sports and recreation purposes in addition to active travel purposes. It is important that this is made explicit in the SDP, ensuring that the right sort of network is developed providing for a range of positive outcomes and not just active travel.

Summary of responses (including reasons) by planning authority:

PP057 – The map on page 13 is designed to be an indicative proposals map, which is

primarily concerned with how Aberdeen City should change over the plan period.

Scottish Planning Policy (para 161) and Circular 1/2009 (para 140) state that SDP's are to identify the broad area of the Greenbelt and set the policy context for development within it. The plan (CC/Doc1) in the regional context map (page 5) identifies the Aberdeen Greenbelt and in chapter 4, objective 4, sets the broad strategic policy direction in relation to the greenbelt. There is no need to specifically identify this within a map which has been designed to identify future strategic development.

The Deeside Way, while important for active travel and recreation, is an existing route where there are no proposals for significant change. It has therefore is not included in the diagram on page 13.

Circular 1/2009 (para 14) states the importance of keeping SDP's concise, visionary documents. The maps were prepared in line with Scottish Government guidance. If the maps were to include too much detailed information they would loose the visual impact they were designed to have.

PP058, PP059, PP061. PP062, PP076, PP007– Paragraph 1.9 of the plan (CC/Doc1) highlights the importance of seeing all parts of the plan together and in context. This in mind, para 2.2 (final bullet point) of the plan makes clear that an important aim of the plan is to make walking and cycling attractive choices. Objective 6 page 38 – 39 outlines the plan's commitment to promoting and encouraging walking and cycling. Paragraph 3.10 highlights that within Strategic Growth Areas there are opportunities to put in place a strategic walking/ cycling network which build on the current network and this is a proposal currently being taken forward through the Regional Transport Strategy refresh and the proposed Active Travel Action Plan. As part of this proposal, 3.10 also highlights that green networks should be incorporated, where possible, into such routes. The purpose of the Strategic Growth Areas (as outlined on page 10) is to locate new housing and employment land near strategic transport routes, which will include strategic walking and cycling routes. Consideration to this will be given throughout the development of all SGA's. The direction of development within these corridors is still being planned and decided on; successful integration of Green Networks will be dependant on a better understanding of what more precise shape this development will take. Therefore, any indication of where green networks/ infrastructure should be incorporated would be at present surmising. The importance of sports and recreation within the context of walking and cycling is recognised. However, para 3.10 of the plan does not state all the potential uses of the strategic walking and cycling routes proposed, and it would not be of benefit to identify just one.

The plan (CC/Doc1) has a crystal mark from the Plain English campaign, which validates the clarity of language and definitions used in the document. Changing the wording to include "*green network hubs*" within the key for detailed diagrams (page 49) would have implications for this.

PP060 - The Formartine and Buchan Way has not been identified in SGA 2 (page 17) because it does not really serve this corridor. Representing the strategic walking/cycling link (on page 17) as a dashed green line may be more appropriate. This route is not yet in existence, so would be more accurately represented as a proposed link.

PP214b – Paragraph 3.10 of the plan makes a commitment to explore the opportunities to put in place a strategic network which builds on the current network by linking

Aberdeenshire towns with Aberdeen in the Strategic Growth Areas. These links are shown in the diagrams on pages 13, 17, 19 and 21. This seems to be just what the representation seeks, with the exception of the use of the words ‘we should explore’. However, this is a proposal being taken forward through the Regional Transport Strategy refresh and the proposed Active Travel Action Plan. Work has already started on this, with potential projects already identified. It would not be appropriate to change the wording at this stage and it wouldn’t impact on the outcome in any event as the proposal will be taken forward by the councils and Nestrans primarily.

In light of the above, there is no need to make any modifications to the proposed plan in response to these representations.

Reporter’s conclusions:

1. SportsScotland calls for the plan to recognise that the proposed walking and cycling network should be as much for sport and recreation as for travel. Paragraph 3.10 of the proposed plan is concerned with the delivery of this network, and makes a link to the wider concept of green networks. However there is no indication in this part of the plan that these networks are intended only, or even mainly, for travel purposes as opposed to recreation. I conclude that while the proposed plan could have described the uses of the walking and cycling network more fully, it is not essential that this is done.

2. Scottish Natural Heritage argues that the diagrams in the plan should show the Aberdeen green belt and existing strategic walking/ cycling links such as the Deeside Way. Paragraph 161 of Scottish Planning Policy requires strategic development plans to identify the broad area of the green belt. Paragraph 4.31 of the proposed plan refers to a continued role for the green belt around Aberdeen, and the context map on page 5 illustrates the spatial extent of the green belt. In my view, the green belt is more than just part of the context for the plan; it remains an important component of the strategic planning of the Aberdeen city region. Paragraph 41 of Circular 6/2013: Development Planning states Ministers’ expectation that strategic greenspace networks (including green belts) will be one of the principal topics for strategic development plans. For these reasons it would have been preferable for the green belt and/ or green networks to have been illustrated on the strategy diagrams throughout the plan. However, I note that neither Scottish Planning Policy nor Circular 6/2013 requires green belts to be illustrated, and that the green belt is depicted on the map on page 5 of the plan. I therefore conclude that the plan is sufficient in this regard.

3. The Deeside Way and other existing long distance walking/ cycling routes are important in themselves and could have cross boundary implications for strategic development. There may therefore be circumstances where it would be useful to illustrate such routes on strategic diagrams, if only to provide a context in the same way that some existing roads and railways are shown. However, these routes are not planning designations, or proposals of this plan. While paragraph 150 of Scottish Planning Policy requires development plans to protect important routes, it does not state that this is necessarily a role for the strategic development plan, or require routes to be individually illustrated. I therefore conclude that it is not necessary for these routes to be included on the diagrams in the plan.

4. Regarding whether the description of the strategic walking/ cycling links shown on the detailed diagrams should refer also to green networks, it is not clear to me that the illustrated links would necessarily form the ‘hub’ of any such networks. While it is

desirable for walking/ cycling links to follow green corridors, this may not always be achievable. I do not have evidence before me to demonstrate that the walking/ cycling links shown in the proposed plan also have a wider green network function, and so conclude that no modification is required.

5. That said, given the role envisaged for strategic development plans in planning for strategic greenspace networks, it would have been preferable for the diagrams to have illustrated spatially the location or proposed location of these networks. However, in the absence of any such comprehensive proposals, it is not possible within the scope of this examination to add green network designations into the strategy diagrams at this stage. This is an issue that can be addressed in the review of the plan. This matter is also addressed under issue 8, where I recommend the introduction of a specific proposal to identify and develop green networks.

6. Regarding positive action to encourage walking and cycling, this matter is already covered reasonably extensively in the proposed plan. Paragraph 3.10 identifies the need to explore opportunities to put in place a strategic walking and cycling network. The Accessibility objective on page 38 seeks to encourage people to walk and cycle. Further references in this section explain why this is important, require major developments to demonstrate easy access by foot and cycle, and state that the action programme and supplementary guidance will contain more detailed measures. The plan is to be read as a whole, and I do not consider that actions to enhance walking and cycling need be included under the individual strategic growth areas, unless there are particular proposals that would be best established at the strategic development plan level.

7. I have no evidence regarding the precise route of the Formantine and Buchan Way, but I am prepared to accept the authority's statement that this does not fully serve the Aberdeen to Peterhead corridor. On this basis it would not be appropriate to illustrate this route on the Aberdeen to Peterhead diagram. However the authority also accepts that the link that is depicted on this diagram is a proposal rather than an existing feature. I therefore recommend that the diagram is modified to accurately reflect this fact.

8. Regarding walking and cycling in the Aberdeen to Huntly strategic growth area, it is clear from the diagram on page 19 of the proposed plan that a proposal exists to deliver strategic walking/ cycling links in this corridor. The diagrams in the plan have as much status as a formal part of the development plan as does the text. Therefore it is not necessary for all the proposals on the diagram to be repeated in the text, though it will often be advantageous to do so if there is further detail to be described. Other references in the plan, for instance at paragraph 3.10 and in the Accessibility section, already describe how the walking and cycling network should be delivered. The plan is to be read as a whole and overall I conclude that it is not necessary to include further text on walking/ cycling links specifically in the Aberdeen to Huntly strategic growth area.

9. Regarding the Aberdeen to Laurencekirk strategic growth area, I have already concluded (paragraph 5 above) that it would have been desirable for the plan to have integrated more comprehensive thinking about green networks and their associated active travel routes into the spatial strategy and diagrams of the plan. In the absence of this having been done, it is not possible, within the scope of this examination, to introduce spatially meaningful proposals at this stage. To merely add a green network notation intended to apply to the whole of the strategic growth area would add little beyond the existing references in the text of the plan. I therefore conclude that it is not practical to modify the plan in the way sought by the representee. However, under Issue 8 I have

recommended a modification to Schedule 2 to include a proposal to identify and develop green networks incorporating walking and cycling routes. It should therefore be possible to include more comprehensive green network proposals in the plan at the time of the next review. The authority's general commitment to explore opportunities to put in place a strategic walking and cycling network in the strategic growth areas is in any event apparent from paragraph 3.10.

10. Green networks are associated with multiple benefits, and so could potentially be referred to in several sections of the plan. However it would not serve clarity or conciseness for there to be excessive repetition. The plan is to be read as a whole and so the importance of green networks is not diminished by statements about them being located only in certain sections. It is not unreasonable for the proposed plan to locate its statements about green networks in the Quality of the environment and Strategic growth areas sections, where the access or active travel aspects of the networks are referred to. Overall I am content that these particular benefits of green networks are appropriately referenced. I therefore conclude that no additional reference to green networks is required in the Accessibility section.

11. Regarding the location of development relative to active travel routes, the second target on page 38 of the proposed plan already requires major developments in strategic growth areas to show that they are easy to access by walking and cycling. Three of the bullet points under How to meet the targets on page 39 of the proposed plan are concerned with access to developments by environmentally-friendly forms of transport, or by foot or cycle specifically. The health, social and environmental rationale for this approach is stated at paragraph 4.44. The representee's concern that the plan should direct new development to locations accessible by active travel modes therefore appears to already be largely satisfied in the proposed plan. I have addressed the need for the plan to more actively commit to the identification and delivery of green networks under issue 8, but here conclude that the plan makes sufficient reference to the location of development in relation to active travel routes.

12. The suggested need to commit to the development of a strategic cycle network is addressed under issue 8, where I conclude that the plan should include a proposal related to the strategic cycling and walking network.

Reporter's recommendations:

I recommend that the following modifications be made:

1. Amend the green line on the diagram on page 17 of the plan depicting strategic walking/cycling links to a dashed line. Amend the key on page 17 to show this dashed line as 'Proposed'.

Issue 12	Strategic Growth Areas – Aberdeen City	
Development plan reference:	Strategic Growth Areas – Aberdeen City (paragraph 3.15 – 3.23, pp 12 – 14)	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> Union Square Developments Ltd (PP127a) John Lewis plc (PP168)</p> <p><u>Site Allocations</u> CALA Homes East Scotland/SRUC (PP003) Aberdeen Football Club (PP103) Grandhome Trust (PP109b) Scottish Retail Properties Ltd Partnership (PP166c) John McIntosh (PP196d) Aberdeen Science Parks LP (PP197b) Drum Property Group Ltd (PP200b) Robert Gordon University (PP204 and PP205)</p> <p><u>Pedestrianisation of Union Street</u> D Fairlie Partnership (PP160, PP161) John Lewis plc (PP171) H Leith (PP237)</p> <p><u>Link over the River Dee</u> Scottish Natural Heritage (PP056)</p> <p><u>Places of Worship</u> The New Aberdeen Mosque & Community Centre Project (PP151b, PP152b, PP153b)</p> <p><u>Diagram (p14)</u> Union Square Developments Ltd (PP127b) Aberdeen Harbour Board (PP210b)</p> <p><u>Regeneration</u> Scottish Enterprise (PP187) Aberdeen & Grampian Chamber of Commerce (PP226)</p> <p><u>Aberdeen Airport</u> Aberdeen International Airport (PP125b)</p> <p><u>Aberdeen Harbour</u> - Aberdeen Harbour Board (PP210a)</p> <p><u>Brownfield</u> Kirkwood Homes Ltd (PP097a) Stewart Milne Homes (PP113) Scotia Homes (PP133a, PP134f) Dunecht Estates (PP148b) Homes for Scotland (PP227b)</p>		

<p>Provision of the development plan to which the issue relates:</p>	<p>Strategic Growth Areas – Aberdeen City</p>
<p>Planning authority’s summary of the representation(s):</p>	
<p><u>Support</u></p> <p>PP127a – Support the recognition that the city centre is an important asset for the region and it has a capacity to contribute towards economic growth as well as the aims of the City Centre Development Framework and Business Improvement District.</p> <p>PP168 – Welcome the proposals to put the city centre development framework into practice and carry out a wider regeneration of the area.</p> <p><u>Site Allocations</u></p> <p>PP003 -The Aberdeen City Strategic Growth Area does not include the Newhills development. As this site is of a similar scale to other developments which have been included CALA are looking for conformation that this will not have implications for the site allocations in the approved LDP.</p> <p>PP103 – The plan should maintain its commitment to a new stadium, identifying Loriston as a potential location, but allow for the potential location of a new stadium on any greenfield site within the City or Aberdeenshire.</p> <p>PP109b – Given the prominence given to sustainable mixed communities in meeting the aspirations of the plan, a reference should be added page 12 to acknowledge that Grandhome is the only project in the North East of Scotland to be identified as part of the Scottish Sustainable Communities Initiative (SSCI).</p> <p>PP166c – The city centre should be specifically identified as a strategic growth area in the diagrams on pages 9, 11 and 13 in recognition of its unique role in the region.</p> <p>PP196d – A proportion of the 8,200 homes relocated from the Rural Housing Market Area to the Aberdeen Housing Market Area should be allocated to the North of the Don Masterplan Area.</p> <p>PP197– Specific mention should be made of the Aberdeen Energy and Innovation Park in the SDP given its role in delivering the SDP’s vision and the National Planning Framework’s ‘key economic corridor’.</p> <p>PP200b – The SDP should recognise existing communities as opportunity areas within the plan and diagrams, not just new flagship allocations. Prime Four should be identified as a potential growth node for a mix of uses.</p> <p>PP204, PP205 – A site located in the Aberdeen City Greenbelt, which runs parallel to Robert Gordon University (RGU) campus, to the South of the River Dee (See site map-SuppRep/Doc14) should be promoted as a sporting infrastructure project within the plan (CC/Doc1). The plan should recognise the need to remove the site from the Greenbelt through the emerging Aberdeenshire Local Development Plan (CC/Doc6).</p>	

Pedestrianisation of Union Street

PP160, PP161 – It does not make any sense to carry forward the proposal to pedestrianise Union Street, from older historic plans. It is not appropriate to include this proposal within either para 3.21 or within Schedule 2 Proposals (page 44) without carrying out greater consideration and further public consultation. Further consideration of such a proposal is more appropriately carried out as part of the Aberdeen Local Development Plan.

PP171 – Recognises the benefit of partly pedestrianising Union Street. However, the traffic impact on surrounding city centre streets will need to be taken into consideration. Further investigation and consultation into the impact of this proposal will be required.

PP237 – Pedestrianisation of Union Street would cause traffic congestion and delays; it would be inconvenient for bus users; disincentive shopping and make Union Street less safe at night for pedestrians, as it would lack the security of passing traffic.

Link over the River Dee

PP056 – The proposal in the plan (CC/Doc1) for a link over the River Dee (para 3.18, final bullet point) should reference the need for a Habitats Regulation Appraisal, as outlined in para 5.6.

Places of Worship

PP151b, PP152b, PP153b – The New Aberdeen Mosque and Community Centre should be dealt with as a strategic issue within the proposed plan.

Diagram (p14)

PP127b – The purpose of the plan on page 14 is unclear and it does not appear to reflect the development of Union Square.

PP210b – The plan on page 12 [reference should be page 14] is out of date and should be either updated or annotated as historical.

Regeneration

PP187 – Greater emphasis needs to be placed on the importance of the city centre as a major employment centre and destination of choice for visitors and residents of Aberdeen City and Shire. It should encourage more office development in the city centre and provide greater flexibility into transport policies. Higher levels of parking provision are required to meet occupier demand. There needs to be investment in the city centre.

PP266 – The plan is not explicit enough about the need for development which will encourage footfall into the city centre.

Aberdeen Airport

PP125b - Paragraph 3.19 should read 'in progress and more are planned' rather than 'needed'. The text currently implies that there is a problem that needs to be fixed rather than continued development of the airport.

Aberdeen Harbour

PP210a – Update required to text to reflect emerging NPF and proposals for growth of Aberdeen Harbour.

Brownfield

PP097a – The 5,000 units previously identified for regeneration areas in Aberdeen City in the current structure plan should be put back in as greenfield allowances in Aberdeen City.

PP113 – The level of brownfield housing set out in the Proposed SDP within Aberdeen City is unachievable. Successive urban capacity studies have failed to demonstrate that there is suitable land available to deliver 10,500 homes in the City. Unlike many other cities, Aberdeen does not have an industrial past which has resulted in surplus employment land which can be used for residential use. Furthermore, the buoyant economy in the North East continues to ensure any employment land is quickly recycled for employment uses.

PP133a, PP134f – The SDP should clearly identify a policy preference for greenfield releases and a direction for LDPs to favour smaller greenfield sites, or remove the greenfield / brownfield split to allow flexibility to LDPs.

PP148b – It is not considered appropriate to require that 40% of all new housing in Aberdeen City should be on brownfield sites. There is a finite amount of such sites with a number currently in the pipeline for redevelopment. Moving forward through the Strategic Development Plan period there will be a diminishing supply of such sites and it is considered onerous to impose such a target.

PP227b – Brownfield sites should only be classed as windfall and not be relied upon as formal allocations.

Modifications sought by those submitting representations:

Support

PP127a, PP168 – None sought (supportive)

Site Allocations

PP003 – None specified

PP103 – Amend Diagram 5 to remove the King Links as a potential location and para 3.23 to refer to “one possible location is shown for a new Community Stadium to support the growing infrastructure of the city. Amend Schedule 2 to delete reference to the two possible locations on Diagram 5 and replace with “(the location may be within Aberdeen City or Aberdeenshire and is likely to require a greenfield site.)”

PP109b – Given the prominence given to sustainable mixed communities in meeting the aspirations of the plan, a reference should be added page 12 to acknowledge that Grandhome is the only project in the North East of Scotland to be identified as part of the Scottish Sustainable Communities Initiative (SSCI).

PP166c – The city centre should be specifically identified as a strategic growth area in the diagrams on pages 9, 11 and 13.

PP196d – A proportion of the 8,200 homes relocated from the Rural Housing Market Area to the Aberdeen Housing Market Area should be allocated to the North of the Don Masterplan Area.

PP197b – Specific mention of Aberdeen Energy and Innovation Parks.

PP200b – The SDP should recognise existing communities as opportunity areas within the plan and diagrams, not just new flagship allocations. Prime Four should be identified as a potential growth node for a mix of uses.

PP204, PP205 - The site owned by RGU to the south of the River Dee should be included within Schedule 2 (Proposals) as well as within para 3.23 which references Community Stadiums and within the key detailed diagrams for the Aberdeen City Strategic Growth Area. The plan (CC/Doc1) should recognise the need to review the Greenbelt at this location through the emerging LDP process.

Pedestrianisation of Union Street

PP160, PP161 – Changes to para 3.21- Either delete references in the plan to any pedestrianisation of Union Street or alter the wording to ensure up – to date reports are produced and properly consulted on before making a firm commitment to it. Changes to Schedule 2; Proposals - Delete specific references in the Strategic Development Plan to making a commitment to any further pedestrianisation of Union Street or include the fact that this particular issue needs to be considered further and properly consulted on as part on any Local Development Plan.

PP171 – Addition after ‘*environment*’ in the final sentence of para 3.21 – “*Partial pedestrianisation of Union Street will have an important role in this regard and shall be the subject of further detailed investigation and consultation*”.

PP237 – Remove the pedestrianisation of Union Street from the proposed plan.

Link over the River Dee

PP056 – Final bullet point of para 3.18 to be amended to “*a link over the River Dee (see paragraph 5.6)*”.

Places of Worship

PP151b, PP152b, PP153b – The New Aberdeen Mosque and Community Centre should be highlighted at three points in the plan: (1) in the diagram on page 13; (2) in Schedule 2 on page 44 (after the entry for Community Stadiums, a new entry “The New Aberdeen Mosque and Community Centre- a regionally important facility which will help attract international investment and promote and support the knowledge economy led by the two universities”); and (3) after paragraph 3.23, additional paragraph: “The location for the New Aberdeen Mosque and Community Centre, which is of strategic significance for the City and the Shire is shown”.

Diagram (p14)

PP127b – Amend the plan on page 14 to reflect the development of Union Square.

PP210b – The plan on page 12 [reference should be page 14] should be either updated or annotated as historical.

Regeneration

PP187 – Clear guidance is required to identify what can be done to help achieve the plan’s ambitions for the city centre. Stronger references to the city centre should be made in paragraphs 3.21 and 4.4 [assume should be 4.2]. Reference should be made to the bid for Aberdeen to become UK City of Culture 2017. The Aberdeen LDP should be required to consider policies which will attract more major office developments to the city centre. Schedule 2 should be ordered into categories (including the city centre) and an area around Palmeston Road/Riverside Drive highlighted as a development zone for new office development.

PP266 – The plan should provide greater clarity about the type of development that should be delivered to regenerate the city centre to avoid a ‘doughnut effect’.

Aberdeen Airport

PP125b – Paragraph 3.19 should read ‘in progress and more are planned’ rather than ‘needed’.

Aberdeen Harbour

PP210a – Adjustment to the wording of 4th sentence of Paragraph 3.20 to state: “Given the existing Harbour’s location in the city-centre, this work should take into account the wider city-centre regeneration as part of the current City Centre Development Framework and the competing demands for land.” Adjustment to the overall wording of Paragraph 3.20 to reflect proposals for potential growth of Aberdeen Harbour outwith the present estate boundary and the potential status of this proposal as a National Development in the emerging NPF3, depending on the outcome of NPF preparation process.

Brownfield

PP097a – Add 5,000 units to the greenfield allowances in Aberdeen City.

PP113 – Redistribute brownfield land allocations in Aberdeen to greenfield sites in the Aberdeen Housing Market Area. Given the uncertain nature of supply brownfield sites any development on such sites should be treated as “windfall”.

Remove target on Page 37 for 40% of all new housing in Aberdeen City to be on brownfield sites.

PP133a, PP134f – The SDP should clearly identify a policy preference for greenfield releases and a direction for LDPs to favour smaller greenfield sites, or remove the greenfield/brownfield split to allow flexibility to LDPs.

PP148b – The target for 40% of all new housing in Aberdeen City to be on brownfield sites (page 37) should be removed.

PP227b – Brownfield sites should only be classed as windfall and not be relied upon as formal allocations.

Summary of responses (including reasons) by planning authority:

Support

PP127a, PP172a – Support welcomed

Site Allocations

PP003 – Grandhome and Countesswells are both identified in the diagram on page 13. Grandhome is one of the Scottish Government’s ‘Scottish Sustainable Communities Initiative’ sites and Countesswells is a new settlement separated from the urban edge of Aberdeen. The fact that Craibstone is not mentioned does not mean that the strategy in the Aberdeen Local Development Plan (2012) is to change.

PP103 – Given the challenges faced in delivering a new Community Stadium it is appropriate to continue to identify two potential sites as in the current Structure Plan. It would not be appropriate to suggest that any greenfield site in Aberdeen or Aberdeenshire could be appropriate given the nature of the development proposed. No alternative sites have been identified.

PP109b –It is not necessary to include a reference to Grandhome as one of the Scottish Sustainable Communities Initiative (SSCI) exemplar sites as this merely serves to promote one particular site. However, if the Reporter was minded to agree with the representation, a sentence could be added to the end of paragraph 3.16 which stated that “Grandhome (‘Place 2’ in the diagram opposite) is proposed as a significant urban expansion of Aberdeen and is one of the Scottish Government’s Scottish Sustainable Communities Initiative exemplar sites.”

PP166c – The city as a whole is a strategic growth area and this includes the city centre. The unique function of the city centre is expressed on top of the strategic growth area designation and this is an appropriate way to deal with it.

PP196d – It is strongly argued under Issue 5 that there is already a generous supply of housing land in both Housing Market Areas, If there were to be any change to the housing allowances in Aberdeen City, it would be the role of the Aberdeen Local Development Plan to allocate those. Significant development is already proposed north of the River Don on the Aberdeen LDP (including 7,000 homes at the Scottish Sustainable Communities Initiative site at Grandhome) and it is not true to say that the area covered by the North of the Don Masterplan is unconstrained, or even less constrained, than other parts of the city.

PP197 – The SDP is focused on change (para 1.7). The Aberdeen Energy and Innovation Parks are existing specialist employment areas to the north of Aberdeen and in the Energetica corridor (SuppSDP/Doc11). The Energy Park has an area for extension (OP4 – 16.4ha) allocated in the Aberdeen City LDP as well as a site to the north for employment uses (OP3 – 68.4ha). As existing sites there is no need to mention them in the SDP.

PP200b – Prime Four is a large new employment site (50Ha) allocated on the back of the current Structure Plan and Aberdeenshire Local Development Plan (site reference OP40) and is currently being developed. While the importance of Prime Four is recognised in the plan through the inclusion of the image on page 24 of the plan, this does not have policy implications attached to it. It is not the role of the SDP to allocate particular sites for specified uses, this is properly a matter for the LDP. However, the SDP does identify two of the most significant land use changes in Aberdeen on the diagram but cannot do that for all of them. The plan does not focus just on ‘flagship’ proposals at the expense of the expansion of existing communities. It would not be appropriate to make the changes sought.

PP204, PP205 - The plan highlights the importance of promoting university development and supporting the knowledge based economy in para 4.3. This is further outlined in Schedule 2 (Proposals). However, the decision as to what is appropriate development in the Greenbelt is for consideration by Aberdeenshire Council through their LDP. The representation states that Robert Gordon University will promote the site (SuppRep/Doc18) through the LDP process; this is considered the most appropriate course of action. The plan (CC/Doc1) in para 4.31 acknowledges that the Greenbelt round Aberdeen City will inevitably need to change to meet the growth envisaged. However, it is not for the plan to advocate what specific sites are to be included or excluded from the Greenbelt. Importantly, this site is in an extremely sensitive location on the banks of the River Dee and any development would need to be carefully assessed through a Habitats Regulation Appraisal and flood risk assessment.

Pedestrianisation of Union Street

PP160, PP161, PP171, PP237 – Pedestrianisation of Union Street is an integral proposal within the Aberdeen City Centre Development Framework (SuppSDP/Doc2d). It is also a strategic priority within the Aberdeen City Urban Realm Strategy, the scale and implications of such a project justifies its inclusion in the proposed SDP. Informal public consultation on the pedestrianisation of Union Street took place in 2004 (SuppSDP/Doc20). The pedestrianisation of Union Street is an on-going issue which will be subject to further scrutiny through a variety of channels (including the Regional Transport Strategy; Local Transport Strategy; Local Development Plan; City Centre Development Framework as well as the SDP and LDP). The Aberdeen City Centre Development Framework which deals with the pedestrianisation of Union Street in section 5.1, forms Supplementary Planning Guidance for the Local Development Plan and was open to public consultation along with the proposed Aberdeen Local Development Plan in 2010/1. Any future developments in the pedestrianisation of Union Street will be open to further analysis and public consultation (including through the next LDP process).

Work into the implications of pedestrianisation is on-going and will include further transport modelling, this will provide a greater understanding of the implications of pedestrianisation. Under the Scottish Transport Appraisal Guidance (STAG) the pedestrianisation of Union Street is subject to an appraisal which will consider the significant implications of the project against nationally significant criteria and would include an overall assessment into the safety of the area should it be pedestrianised. Given the scale and potential implications of the development it would not be appropriate to omit it from the plan.

Link over the River Dee

PP056 – The plan para 1.9 states that recognising the link between different parts of the plan is integral. The emphasis is on the plan being read as a whole, this minimizes the need for repetition and continuous cross referencing. The need for a Habitats Regulations Appraisal for this project is already mentioned once (para 5.6) and does not need to be repeated.

Places of Worship

PP151b, PP152b, PP153b – While the important contribution the new Aberdeen Mosque and Community Centre will make to residents and communities throughout Aberdeen City and Shire is recognised, the development is not one which needs to be referenced in the SDP. Issues for consideration in Strategic Development Plans as outlined in Circular 1/2009 (CC/Doc9) para 14, are those which encapsulate the headline changes the plan seeks to achieve and are expected to include issues such as land for housing; business, shopping and waste management development; strategic infrastructure (including transport, water supply and waste water) and strategic greenspace networks. It is not expected that SDP's will usually deal with site specific issues which are properly matters for the Local Development Plan. The new Mosque is allocated as site OP107 within the current Aberdeen Local Development Plan 2012 (CC/Doc 7, Appendix 2, page 245) and within the proposals map and this is still the most appropriate way to address the development proposed.

Diagram (p14)

PP127b, PP210b – It is agreed that it would be appropriate to either specify a date for the image on page 14 in the final version of the plan or bring it up-to-date with the major developments which have occurred since it was prepared.

Regeneration

PP187, PP266 – The proposed plan is clear in the importance it attaches to the city centre and the need to focus in improving it. The references are sufficiently strong and do not need to be strengthened. The proposed plan sets out clear objectives. Increasing footfall and new office development could be two ways of achieving this but will be considered by the Aberdeen LDP at the more detailed level, balancing all the competing uses for the area. Policies for office parking in the city centre need to be seen in the context of a wide range of factors as well as the economic one, the need to encourage more sustainable modes, particularly in the most accessible location, is important as well but is a matter for the LDP. Mentioning the City of Culture bid would not be appropriate as a decision will be made before the plan is approved. Schedule 2 is already ordered in such a way as to generally keep related proposals together and does not need to be amended.

Aberdeen Airport

PP125b – The current text is written in plain English, whereas the alternative is more complex, deflecting rather than focussing attention. Development at the airport is needed for the benefit of the local economy. If there was no need it would not receive the attention it does in NPF2 and the SDP itself.

Aberdeen Harbour

PP210a – The proposed SDP was up-to-date at the time of its preparation and nothing substantial has changed since which would indicate that the plan itself needs to change. The ‘Case for Growth’ is referenced in paragraph 3.20 and while the harbour has been identified as one of the provisional suite of National Developments in the Main Issues Report for NPF3 (SuppSDP/Doc2, page 60), this does not carry sufficient weight at the current time to justify a change to the SDP. The final version of NPF3 is due for June 2014 which would be well after the expected conclusion of the SDP examination and the SDP’s approval by Scottish Ministers. The Action Programme references the need to work in partnership to deliver improvements to Aberdeen Harbour (CC/Doc4a, Actions 27 and 137).

Brownfield

PP097a, PP113, PP133a, PP134f, PP227b, PP148b – There is a significant long-term trend of brownfield sites coming forward for residential development in Aberdeen. Since 1982 there have only been three years where the rate has been less than 40% (Monitoring Statement CC/Doc 5h, Figure 7) and the last occasion was 1988. Figures from 2006 to 2011 have all been above 90% and the average number of homes on brownfield sites has been almost 650 each year (BUCS SuppSDP/Doc 30, page 4, Table 1). The most recent Urban Capacity Study (2012, SuppSDP/Doc 30) identifies future potential at between 3,400 and 6,000 units (SuppSDP/Doc 30, page 13, Table 5) in addition to those in the effective supply on 1 January 2012. In this context, the allowances in the proposed plan are conservative.

Scottish Planning Policy makes it clear that the “redevelopment of...brownfield sites is preferred to development on greenfield sites. When identifying locations for housing, planning authorities and developers should consider the reuse of previously developed land before development on greenfield sites” (Doc s para 80). To state a preference for greenfield sites in the SDP would therefore be clearly contrary to Scottish Government Policy. The percentages of new homes in Aberdeen City on brownfield sites targeted by the plan is significantly lower than the long-term trend due to the scale of growth anticipated but there is still a need to prioritise brownfield development.

The allowance for 5,000 units in regeneration areas in Aberdeen City in the current structure plan was on the basis of this number of units being demolished and therefore newbuild being required to compensate (as recognised in PP097a). This large-scale demolition is now no longer planned and as a result there is no need for the replacement housing. These 5,000 units were previously part of the housing requirement in the Aberdeen Housing Market Area in the current structure plan but not in the proposed plan. There is no justification for ‘re-allocating these units’ and this explains why the requirement in the Aberdeen Housing Market Area fell between the two plans and has nothing to do with levels of ambition.

The continuing availability of brownfield sites will be regularly monitored, including in the next Monitoring Statement and inform the next SDP.

In light of the above, there is no need to make any modifications to the plan in response to these representations.

Reporter's conclusions:Site Allocations

1. The authority has clearly been selective about the new communities it has chosen to illustrate on the diagram on page 13 of the proposed plan. There has been no attempt to depict all the major land allocations that have already been made, or may be forthcoming in local development plans. Indeed it would probably go beyond the role of the strategic development plan to do so. I therefore conclude that it is not necessary to show the Newhills site on this diagram and that no modification is required.
2. Two potential broad locations are shown on the diagram on page 13 of the proposed plan as potential community stadium sites. The evidence submitted indicates that there are challenges associated with delivering a stadium in either of these locations. However no alternative sites have been suggested. One of the main purposes of the plan is to give some spatial direction to the location of new development. I therefore agree with the authority that it would not be appropriate to include a statement in the plan that would give little indication as to where the new stadium might go. I conclude that it remains appropriate to illustrate the two locations that do appear to have been investigated as potential sites.
3. There are calls to include references in the plan to the Aberdeen Energy and Innovation Park and the Prime Four Business Park, and also to Grandhome being a part of the Scottish Sustainable Communities Initiative. Such references might provide useful information or points of emphasis. However, these sites all appear to have an established planning status, and picking them out would not alter the practical effect of the plan. There is no pressing need for these changes to be made, and I therefore conclude that no modification is required.
4. The strategic growth areas identified in the plan are broad geographical concepts, and that for Aberdeen covers the entire city including the city centre. To overlay a separate strategic growth area for the city centre within the broader Aberdeen strategic growth area would be confusing and a break from the approach taken elsewhere in the plan. City centre regeneration is already included as 'place 5' on the diagram on page 13 of the plan, and the improvement and regeneration of the city centre is discussed at some length in paragraph 3.21. It is clear to me that the existing broader strategic growth area for Aberdeen as a whole incorporates a strong focus on maintaining and improving the health of the city centre. In these circumstances I conclude that no separate strategic growth area for the city centre need be identified.
5. Regarding development north of the Don, the overall scale of growth and the balance between housing market areas is discussed under Issue 5. The proposed plan does not attempt to identify which locations within Aberdeen City should be developed, but leaves this level of spatial planning to the local development plan. Regardless of the possible advantages of the north Don area, it would not be appropriate for me to depart from this approach for one particular site. I therefore conclude that no modification is required.
6. I do not wholly concur with the authority that it must necessarily be the role of the local development plan to consider the need for, and location of, the proposed outdoor sports facility south of Garthdee campus. It appears this may be a significant regional facility that could, if worthy of support, appropriately have been covered in the strategic development plan. Paragraph 41 of Circular 6/2013: Development Planning states that

strategic development plans may be site specific especially where there are no realistic alternative sites. However, the evidence submitted is not sufficiently detailed or persuasive to lead me to conclude that it is necessary to include this proposal in the plan. Also, as the authority points out, this particular location is a sensitive one, so the proposal will require detailed assessment before it can be confidently included in the development plan. I therefore conclude that no modification is required.

Pedestrianisation of Union Street

7. Representees are either opposed to the proposal to pedestrianise part of Union Street or wish it to be subject to further consideration or consultation.

8. This proposal has been rolled forward from the approved structure plan. The only possible change in circumstance that has been raised is the very passage of time since this proposal was consulted on. However, as the authority points out, the pedestrianisation proposal was included in the Aberdeen City Centre Development Framework (document SuppSDP/Doc 29), which was subject to public consultation relatively recently, in 2010/ 2011. This framework now forms supplementary guidance to the local development plan, and so itself forms an up-to-date part of the development plan. The framework describes the public engagement that was carried out by Aberdeen City Council in its preparation.

9. Other possible changes in circumstance have been the economic downturn of recent years, which has affected the retail sector, and the recent focus on town centre regeneration brought about by the Scottish Government's town centres review. It is beyond the scope of this examination to draw general conclusions on the effectiveness of pedestrianisation as a means of revitalising Scotland's town and city centres. However, in the case of Union Street, I am satisfied that the authority and Aberdeen City Council have undertaken a satisfactorily robust and inclusive process to support the pedestrianisation proposal. I therefore conclude that no sufficient grounds have been given for removing this proposal from the plan, and that no modification is required.

Link over the River Dee

10. I have considered the need for a specific habitats regulations caveat regarding the River Dee link under issues 4 and 8. The plan is to be read as a whole, and it is unnecessary to include extensive cross-referencing. I therefore conclude that no modification regarding this matter is required to paragraph 3.18.

Places of Worship

11. Paragraph 41 of Circular 6/2013 states that strategic development plans are expected to cover strategic infrastructure. In my view, such infrastructure could include development required to meet the social or religious needs of the region. Paragraph 41 also allows strategic development plans to be site specific. The proposed new Aberdeen mosque and community centre appears to be a regional facility, and as such could conceivably be a suitable subject for inclusion in the strategic development plan.

12. However, it is not the principal role of development plans to, in the words of the representee, "recognise and broadcast" the benefits of a development. Rather their role is to guide the future use of land. A site for the mosque and community centre has already been allocated in the Aberdeen Local Development Plan. While referring to this

development in the strategic development plan would not have been inappropriate, neither is it necessary as the proposal already has a suitable development plan context. I therefore conclude that no modification is required.

Diagram

13. The diagram of Aberdeen city centre on page 14 of the proposed plan does not reflect recent developments on the ground. However, the diagram is largely illustrative. Its only possible practical use for the interpretation of policy is to provide an indication of the physical extent of the city centre, which does not appear to be in dispute. It is also the case that developments could occur at any time that would change the footprint of buildings in the city centre, though developments of the scale of Union Square are admittedly rare. Paragraph 117 of Circular 6/2013 indicates that I should only recommend modifications to parts of plans that are clearly inappropriate or insufficient. I conclude that this matter is not of such practical significance as to render the plan clearly inappropriate, and that therefore no modification is required. I note the authority's willingness to either date or replace the diagram with an up-to-date version, but consider that this can be done when the plan is reviewed.

Regeneration (Aberdeen City Centre)

14. Paragraph 3.21 of the proposed plan stresses the regional importance of Aberdeen city centre. However the emphasis is largely on regeneration and environmental improvement, rather than the centre's economic function within the region. There are likely to be different implications for the wider regional economy and for strategic infrastructure of economic development taking place in the city centre as opposed to in other locations. To a certain extent it is therefore regrettable that the strategic development plan has not taken the opportunity to provide stronger spatial direction regarding which of the region's economic development needs should be met in the city centre.

15. Scottish Enterprise's representation confirms that office development may be expected to be a key part of the economic function of the city centre. Offices are not covered specifically in the plan, but paragraph 3.21 does refer to the City Centre Development Framework. This document largely focuses on environmental and design concerns but also highlights the potential of the Riverside area to become a 'central business district'. Overall I conclude that the city centre's economic development role, particularly for office development, is important regionally and therefore a matter that should be covered in the plan. Given that opportunities appear to exist to accommodate such development, I recommend a suitable addition to the plan.

16. I agree with the authority that specific actions to regenerate the city centre will in the main be too detailed to include in a strategic development plan. It is more important that the plan describes the role and function of the centre in the regional context. Similarly, any car parking standards pertaining to city centre offices is a matter more appropriately addressed in the local development plan or in supplementary guidance.

17. Scottish Enterprise also contends that the Palmerston Road/Riverside Drive area should be specifically highlighted on the spatial diagram for Aberdeen City. Part at least of this area has been mentioned in the City Centre Development Framework as being suitable for business development. While the strategic development plan could describe particular locations within the city centre to which office development is to be directed, its

more important function is to describe the role of the city centre as a whole. The individual locations where particular uses are to be encouraged can equally well be described in the local development plan. I conclude that it is not necessary to include the Palmerston Road/ Riverside Drive proposal in the plan.

18. Aberdeen's bid to be the United Kingdom's City of Culture in 2017 was unsuccessful. It would therefore be inappropriate to include a reference to the bid in the plan.

19. While there is some merit in the suggestion of categorising the proposals in Schedule 2, it is not essential that this is done. In any event the proposals are largely presented in groupings already, albeit by topic (transport, economy, energy etc.) rather than by area.

20. The Aberdeen and Grampian Chamber of Commerce argue that the plan should say more about encouraging footfall in the city centre and linkages between the city centre and the western peripheral route. Footfall is included in paragraph 59 of Scottish Planning Policy as an example of an indicator of the vitality and viability of town centres. I therefore agree that encouraging footfall would be desirable. The proposed plan points to the City Centre Development Framework for details of how the city centre is to be regenerated. This document describes its principal focus as being "on the enjoyment of the City Centre by the pedestrian, allowing and encouraging people to spend time in a vibrant urban environment". Various measures for different urban quarters and character areas follow. The framework is an appropriate location for such measures to be set out and I conclude that no modification to the strategic development plan is therefore required.

21. The representation does not describe what kind of linkages are envisaged, but I note that the proposed plan already includes a number of transport proposals that could meet this description. These include a number of road improvements and new and more frequent bus services and priority measures. I conclude that no further change is necessary.

Aberdeen Airport

22. Paragraph 3.19 of the proposed plan refers to improvements at the airport being 'needed'. National Planning Framework 2 identifies improvements in access, terminal facilities and new parking arrangements at Aberdeen Airport as a national development. It also includes a 'statement of need' for the development. There is some validity in the representee's argument that the use of the word 'need' implies that there is a problem. However, given the use of this terminology in the National Planning Framework, I cannot conclude that it is inappropriate to include it in the strategic development plan.

Aberdeen Harbour

23. Proposals for the further development and possible expansion of Aberdeen Harbour are clearly emerging. However there are no indications that at least part of the harbour operations will not continue to take place in the city centre. I therefore conclude that the reference in paragraph 3.20 of the proposed plan to the harbour having a city centre location remains appropriate.

24. Paragraph 130 of Circular 6/2013 states that it is the purpose of action programmes to set out how plans are to be implemented. Actions 27 and 134 in the proposed action programme for the strategic development plan set out the range of partners (including Aberdeen Harbour Board and Aberdeen City Council) that will need to work together to deliver development proposals at Aberdeen Harbour. It is not therefore necessary to refer to joint working arrangements to deliver the harbour project in the plan itself.

25. Paragraph 3.20 of the proposed plan already refers to accommodating the growth of the harbour. Beyond this reference, I consider that it would be premature to refer to the particular Nigg Bay proposal, or to the possibility of national development status, in advance of National Planning Framework 3 being finalised.

Brownfield

26. The proposed plan contains a target for 40% of all new housing in Aberdeen City to be on brownfield sites. This target is rolled forward from the existing structure plan, but because the urban capacity and historical completion data have changed since then, I have considered whether this remains appropriate.

27. Paragraph 80 of Scottish Planning Policy states that redevelopment of brownfield sites is preferred to development on greenfield sites. It continues that when identifying locations for housing, authorities and developers should consider the reuse of previously developed land before development on greenfield sites. Given this national policy context, it would not be appropriate for the plan to actively promote greenfield development in preference to brownfield. Nor is it inappropriate for the strategic development plan to contain a target for brownfield development.

28. The authority justifies the level of the target partly on the basis of historical data which shows the 40% rate to have been exceeded in most years since 1982. While the extrapolation of past trends can be useful, one reason for the high proportion of brownfield development in the past may have been the relative shortage of greenfield sites in this period, particularly latterly. This point is acknowledged in paragraph 2.2 of the Aberdeen Brownfield Urban Capacity Study. With the greater release of greenfield sites resulting from the approval of the current structure plan, one might reasonably expect the proportion of brownfield completions to fall.

29. In terms of the absolute number of brownfield completions in Aberdeen, the urban capacity study indicates an average figure of 647 units was achieved between 1991 and 2011. This figure falls to 619 when looking only at data since 1997, and to 598 since 2002. This fall is due to the increasing influence of the marked dip in completions since 2007, which I expect to have been caused primarily by the wider economic situation. Overall I consider that the historical data indicates that a brownfield completion rate of around 600 dwellings a year would be a reasonable assumption.

30. Looking to the future, the urban capacity study identifies the potential for between 3,405 and 6,000 dwellings on specific brownfield sites. In addition to these figures, Schedule 1 of the proposed plan indicates that there were a further 1,188 brownfield dwellings in the effective supply in 2011. The 2011 – 2026 housing requirement for the Aberdeen housing market area is identified as 24,982 dwellings in Figure 10 of the proposed plan. The figures in the urban capacity study and the effective supply represent between 18% and 29% of this. However, completions in the Aberdeenshire portion of the Aberdeen housing market area will also contribute heavily to

meeting the requirement, and in terms of achieving the 40% target within the city, brownfield completions will also take place on sites not identified in the urban capacity study.

31. Only the highest of the estimates provided by the urban capacity study meets the 6,000 unit brownfield allowance for Aberdeen City for 2017 to 2035 set out in the proposed plan. And not all the sites in the study will be suitable for allocation in the local development plan, either because they are too small, will be developed before the local development plan is prepared, or will not come forward for housing development at all. However, the range of sites identified in the urban capacity study inevitably represents a snapshot of potential opportunities at one particular time. It is not therefore surprising that a shortfall emerges using some estimates. In any event, paragraph 72 of Scottish Planning Policy only seeks precise land requirements to be set out up to year 12 (in this case 2026). All the estimates provided by the urban capacity study indicate that sufficient land may be available to accommodate significantly more than the 3,000 additional brownfield units required by 2026. The situation after 2026 can be reassessed through the next review of the strategic development plan.

32. The proposed plan's housing allowance for brownfield land in Aberdeen amounts to 10,500 dwellings, or 33% of the Aberdeen total. When the effective land supply is taken into account, the brownfield proportion rises to 34% (11,688 dwellings). For the 2017 to 2026 period, the plan allows for 333 brownfield units to be built each year (37.5% of the total for this period), rising to 375 units for the 2027 to 2035 period (43% of the total for this period). It is clear therefore that the proposed plan does not (at least initially) rely on meeting its 40% brownfield target in order to achieve the required number of housing completions in Aberdeen. It does however expect the brownfield proportion to rise over time. However these figures remain significantly lower than the 600 dwellings a year that the historical data indicate might occur.

33. I therefore conclude firstly that the 40% brownfield target is an aspiration rather than a requirement; secondly that the evidence indicates that this target is achievable; and thirdly that the 3,000 unit brownfield allowance for Aberdeen between 2017 and 2026 appears to be achievable. No modification is therefore required.

34. Paragraph 81 of Scottish Planning Policy advises the use of urban capacity studies, and that the private sector should be involved in these. It also suggests that the results of the study should be made available. However it does not require the authority to formally consult on the study. Predicting the future capacity of sites which do not yet benefit from planning permission will inevitably involve certain assumptions. The Aberdeen urban capacity study acknowledges that a number of approaches can be taken and so presents a range of results. These are based in part on a range of density assumptions, including analysis of the different densities that may be expected in different parts of the city or on different sizes of site. Overall I am satisfied that the methodology used in the urban capacity study was sufficiently robust to inform the strategic development plan.

35. Windfall sites are by definition not identified in the development plan. There is no support in national policy for the notion that brownfield sites cannot be identified in the development plan and therefore contribute towards meeting the housing requirement. I therefore conclude that brownfield sites should not automatically be treated as windfall sites.

36. Kirkwood Homes Limited argue that 5,000 units should be added to the greenfield housing allowances in the Aberdeen housing market area to replace a previous allowance for regeneration areas. The authority has explained that these units were included in the existing structure plan to account for the replacement of units that were to be demolished. A decision has now been taken not to demolish these homes. I accept that on this basis there is no need to reinstate these 5,000 units in the plan.

Reporter's recommendations:

I recommend that the following modification be made:

1. Insert the following new sentence after the second sentence of paragraph 3.21: "More major office developments need to be attracted to the city centre."

Issue 13	Strategic Growth Areas- Aberdeen to Peterhead	
Development plan reference:	Strategic Growth Areas – Aberdeen to Peterhead (paras 3.24 – 3.29, p 16-17)	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> Scotia Homes Ltd (PP104a) CastleGlen Land Search Ltd (PP212a)</p> <p><u>South Peterhead Development Framework</u> SSE Generation Ltd (PP216c) SHE Transmission plc (PP217c)</p> <p><u>Energetica</u> Scottish Enterprise (PP188)</p> <p><u>Menie Estate Golf Resort</u> E Hurry (PP098)</p> <p><u>Sites and Settlements</u> Scotia Homes Ltd (PP104b) CastleGlen Land Search Ltd (PP212b)</p>		
Provision of the development plan to which the issue relates:	Strategic Growth Areas	
Planning authority’s summary of the representation(s):		
<p><u>Support</u></p> <p>PP104a – Support for the significant potential of this area (para 3.24) the housing allowance for Blackdog – Ellon in Figure 2 and the specific mention of Ellon.</p> <p>PP212a – Welcome the continued priority given to the Strategic Growth Areas in the proposed Plan.</p> <p><u>South Peterhead Development Framework</u></p> <p>PP216c – While welcoming the approach set out in the SDP (and its positive approach to planning for energy generation), it is unclear what weight will be given to the Development Framework (Para 3.28, p16 and Figure 7, p29) in the decision-making process or who will commission the work. It is important that the SDP recognises the potential conflict between the Development Framework and the Environmental Improvement Masterplan.</p>		

PP217c - While welcoming the approach set out in the SDP, it is unclear what weight will be given to the Development Framework (Para 3.28, p16 and Figure 7, p29) in the decision-making process or who will commission the work.

Energetica

PP188 – Energetica is a key project which needs to be more strongly reflected in the SDP, particularly the economic benefits of its component parts.

Menie Estate Golf Resort

PP098 – The plans (CC/Doc1) expectations for the Menie Estate golf course should be adjusted and scaled back to recognise the detrimental impact the Aberdeen Bay Offshore Windfarm being granted planning permission will have on the golf course's economic potential.

Sites and Settlements

PP104b – The settlements of Newburgh and Belhelvie should be included on the diagram on page 17, as they have the capacity for modest levels of local growth, considered with para 3.5.

PP212b – Potterton offers opportunities for future development and is well located in relation to existing and proposed infrastructure and employment.

Modifications sought by those submitting representations:

Support

PP104a, PP212a – none sought.

South Peterhead Development Framework

PP216c – It is unclear what weight will be given to the Development Framework in the decision-making process or who will commission the work. It is important that the SDP recognises the potential conflict between the Development Framework and the Environmental Improvement Masterplan.

PP217c - It is unclear what weight will be given to the Development Framework in the decision-making process or who will commission the work.

Energetica

PP188 – Reference should be made to various existing and proposed business parks, the economic benefits of various component projects and a section devoted to it in Schedule 2.

Menie Estate Golf Resort

PP098 – Addition to paragraph 3.29 after reference to Menie Estate: *However, the Scottish Government has given consent for the proposed Aberdeen Bay Windfarm. This has already dealt a massive blow to the Menie Estate Golf Resort project by creating*

uncertainty for potential investors. If the windfarm is built it will transform the environment to an unacceptable degree and ruin the visitor experience for users of the resort. At best, investment will be scaled back and at worst the project will be abandoned.

Sites and Settlements

PP104b - Identify Newburgh and Belhelvie on the diagram on page 17.

PP212b - Alter housing allowances back in line with existing adopted plan.

Summary of responses (including reasons) by planning authority:

Support

PP104a, PP212a – Support welcomed.

South Peterhead Development Framework

PP216c, PP217c - The development framework will have significant weight in the decision-making process but its preparation has only just commenced (with Aberdeenshire Council commissioning the work). The work to date by CBRE was preparatory in nature, in effect stage 1 of a two-stage process. It will be subject to consultation when it reaches draft stage and all stakeholders will be involved in its preparation. The role of the development framework will be to resolve potential policy conflicts in this area and to be a positive framework for development. All stakeholders will be encouraged to participate in its preparation.

The intention would be that it would be supplementary guidance as part of the development plan. If the Reporter felt that the wording is insufficiently clear in the proposed plan, “(as supplementary guidance)” could be inserted after ‘needed’ in paragraph 3.28.

Energetica

PP188 – Energetica encompasses the northern part of Aberdeen and the corridor up to Peterhead and therefore straddles two Strategic Growth Areas. Projects and existing sites such as the AECC, Aberdeen Energy and Innovation Parks, Berryhill Low Carbon Technology Park, ABZ and D2 Business Parks and Aberdeen Airport are all in the Aberdeen Strategic Growth Area.

It is not the role of the SDP to highlight everything being branded under the ‘Energetica’ banner. It is a planning document and therefore not designed to promote ongoing work on Energetica. Far too much detail is sought than would be appropriate in the SDP and it would not be appropriate to cross reference. Economic and employment growth

Carbon Capture and Storage is already adequately referenced under both the spatial strategy and under the ‘Sustainable Development and Climate Change’ objective. It is not necessary for every justification to be contained within the text of the SDP.

Many of the changes sought to Schedule 2 of the plan would be inappropriate as they are existing allocations in Local Development Plans (or housing and employment allowances coming through the SDP) and not new. Those that are new are already highlighted.

Menie Estate Golf Resort

PP098 – The Aberdeen Bay Offshore Windfarm is a complex and on-going planning matter, the definitive outcome of which is still not yet known and should certainly not be pre-empted in the proposed plan (CC/Doc1). Furthermore, the plan does not state any specific economic expectations for the Menie Estate golf course, other than proposing that the economic potential should be realised.

Sites and Settlements

PP104b – The diagram only shows the largest settlements and does so to aid understanding. It is the role of the Aberdeenshire LDP to identify settlements and sites to accommodate growth.

PP212b – It is the role of the Aberdeenshire LDP to identify settlements and sites to accommodate growth.

There is no need to make any amendments to the proposed plan arising from these representations.

Reporter’s conclusions:

South Peterhead Development Framework

1. Some concerns have been raised over the status of the proposed development framework for the southern gateway to Peterhead, whether Scottish Enterprise’s involvement could represent a conflict of interest, and how stakeholders can meaningfully be involved in the preparation of the framework.
2. It is clear from the authority’s response that the intention is for the framework to become supplementary guidance to the development plan. It appears sensible for a framework to coordinate these nationally important developments to have this statutory status. While Scottish Enterprise have had a role in some preparatory work carried out to date, responsibility for adopting the framework as supplementary guidance will sit with the authority or with Aberdeenshire Council.
3. The law requires supplementary guidance to be consulted upon. The authority must then consider any comments and explain how these have been taken into account. The guidance must be sent to Scottish Ministers before it can be adopted. There are therefore safeguards in place to ensure that a reasonably inclusive and robust process is followed in the preparation of supplementary guidance. These processes should go some way towards addressing the concerns of representees.
4. As noted above, I believe it is sensible for the framework to be progressed as statutory supplementary guidance, particularly as this would guarantee the safeguards I have highlighted. I therefore conclude that additional text to clarify this point, similar to that suggested by the authority, should be included in the plan. Indeed without such a reference, either in this plan or the Aberdeenshire Local Development Plan, it would not be possible to progress the framework as supplementary guidance.
5. From the information before the examination, it is impossible to know at this stage whether the prospective framework is likely to conflict with the existing Peterhead

Southern Gateway Environmental Improvement Masterplan, particularly over a site specific matter such as a wild flower meadow. It should be possible to address matters such as this through the process of preparing the framework.

Energetica

6. Scottish Enterprise seek to have the plan include stronger references to the Energetica initiative and various of the individual developments that form a part of it.

7. Energetica is clearly an important economic development initiative, and one that has a strong spatial and cross-boundary character. It is therefore a matter that needs to be included in the strategic development plan. The proposed plan's references to Energetica are all in the context of the Aberdeen to Peterhead strategic growth area. The fact that Energetica includes several developments in Aberdeen City and so is a cross-boundary initiative does not emerge strongly from the plan.

8. It may be that the Aberdeen developments are more established and so do not require to be described to the same degree in the plan, which should concentrate on areas of change. However I note from Scottish Enterprise's representations that at least some new Energetica related initiatives exist in Aberdeen City, around the airport. I consider that the plan should properly reflect the spatial extent of the Energetica initiative and recognise that part of it falls within Aberdeen City. I therefore recommend a change to the plan to achieve this.

9. Taking this change into account, the Energetica initiative will be referred to in the contexts of the strategic growth areas for Aberdeen City and the Aberdeen to Peterhead corridor, the economic growth objective, and the glossary. While it might have been desirable for the proposed plan to have given an even greater emphasis to the spatial planning aspects of Energetica, I conclude that the references that have been included are sufficient. I also agree with the authority that there is no necessity to list all the various sites and initiatives that fall under the Energetica umbrella. Such an approach would be excessively detailed for a strategic development plan and be inconsistent with the approach taken elsewhere in the plan. No further modification is therefore required.

10. I have considered the need to show Energetica as a spatial concept on the diagrams in the plan. It would in some ways be helpful to illustrate such an important cross-boundary development initiative. However to do so would disrupt and confuse the existing graphics which emphasise the strategic growth areas. To identify the individual projects that make up the Energetica initiative on the diagrams would make the diagrams excessively congested. On balance I therefore conclude that the addition I have recommended to the text of the plan will suffice.

11. Carbon capture and storage is discussed at some length at paragraph 4.10 of the proposed plan, including the rationale for and benefits of this technology. Overall this paragraph conveys the priority that needs to be given to development associated with this emerging technology. Because the plan is to be read as a whole, it is not necessary to repeat this material in another section. Nor is it essential to include detailed statistics about the potential benefits in the plan. I conclude that no further references to carbon capture and storage are required.

12. There may have been some advantages in terms of the clarity of the plan in including sub-headings for the sections dealing with Energetica in Chapter 3 and

Schedule 2. However, it is not essential that this is done, and including such sub-headings for this initiative would not be consistent with the approach taken elsewhere in the plan. I conclude that no modification is required.

13. The aspects of representation PP188 relating to the treatment of the knowledge economy in Schedule 2 and of high value markets in the Vision, are covered under Issues 8 and 2 respectively.

Menie Estate Golf Resort

14. The representee suggests adding text that is critical of the proposed Aberdeen Bay Windfarm, particularly its impact on the Menie Estate golf resort. That wind farm is not a proposal of this plan, and it is beyond the scope of this examination to assess, or take a view on, its environmental and economic impact. The proposed plan calls for the economic potential of the golf resort to be realised, and I consider that this remains a reasonable objective whether or not the wind farm goes ahead. The suggested additional text would not change the practical effect of the plan. I conclude that no modification is necessary.

Sites and Settlements

15. I do not interpret the intention of the detailed diagrams of the strategic growth areas as being to specifically identify the particular settlements to which development should be directed. I am also satisfied that the place names that have been included on the diagrams exist mainly to assist the user of the plan to interpret the spatial information presented. Therefore while the inclusion of a settlement on the diagram may be taken as an indication of whether or not that settlement falls within the strategic growth area, the absence of a settlement should not be taken as any indication that development there will not be supported. It is the role of the local development plan to identify the particular settlements and sites that can best accommodate new development. This would include any potential role for land at Potterton. I conclude that no modification is required.

Reporter’s recommendations:

I recommend that the following modifications are made:

1. Replace the second sentence of paragraph 3.28 with: “To achieve this, a development framework for the southern gateway to Peterhead will be prepared as supplementary guidance.”
2. Add new paragraph after paragraph 3.20 to read: “The southern end of the Energetica corridor extends into northern Aberdeen. Here the delivery of projects focussed around energy technology development and energy efficiency will continue.”

Issue 14	Strategic Growth Areas- Aberdeen to Laurencekirk	
Development plan reference:	Strategic Growth Areas – Aberdeen to Laurencekirk (paras 3.34 – 3.36, p 20)	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> Elsick Development Co (PP101c)</p> <p><u>Public transport around the Aberdeenshire/Angus border</u> Tactran (PP006)</p> <p><u>Chapelton of Elsick</u> Elsick Development Co (PP101d) Stewart Milne Homes (PP124) Homes for Scotland (PP142)</p> <p><u>Retail provision in Stonehaven</u> Barratt east Scotland/Drum Development Co (Stonehaven) Ltd (PP194)</p> <p><u>Flooding in Stonehaven</u> Kenneth A Melville (PP165)</p>		
Provision of the development plan to which the issue relates:	Strategic Growth Areas	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p>PP101c – We welcome the specific reference to Chapelton of Elsick in para 3.35.</p> <p><u>Public transport around the Aberdeenshire/Angus border</u></p> <p>PP006 – It is noted that the Aberdeen - Laurencekirk Strategic Growth Area has housing allowances totalling 8,000 units over the period 2017-35. Although it can be envisaged that travel demand from these new residents will be focussed on the Laurencekirk - Stonehaven - Aberdeen corridor there will be potential for more travel between the Growth Area and the neighbouring towns in Angus, namely Montrose and Brechin. New employment attracted to the Growth Area could generate demand from neighbouring parts of Angus. It is unclear also whether secondary health provision will be from Stracathro Hospital, located near the Angus/Aberdeenshire boundary. The Plan emphasises the importance of encouraging people to use public transport and this is an issue for cross boundary travel. The Laurencekirk - Montrose corridor is adequately served by both bus and train services. However, the Laurencekirk - Stracathro Hospital/Brechin corridor is currently served only by a relatively infrequent bus service, reflecting current levels of demand. In particular, this provides limited opportunities for travel in the peak periods when services operate only on school/college days.</p>		

The River North Esk is crossed by only two bridges - Marykirk Bridge on the A937 Laurencekirk - Montrose road and the Lower North Water Bridge on the A92 which operates on a single vehicle priority basis. Although traffic flows on either the A92 or the A937 are modest any additional traffic generated from the designated Areas could have implications for highway capacity and accident risk at the two bridges.

There is a potential issue as well with telecommunications especially in a largely rural area such as around Laurencekirk and the need to ensure links to Angus and beyond to maximise opportunities to reduce the need to travel.

Chapelton of Elsick

PP101d – More land for housing needs to be identified in the Portlethen to Stonehaven corridor between 2027 – 2035. The capacity for future growth at Chapelton of Elsick is set out in the Development Framework.

PP124, PP142 – It is not appropriate for the SDP to state that Elsick has the potential to set the standard for new development across the City and Shire before development commenced (Page 20, para 3.35). It is only through the experience of completed development can such judgements be made.

Retail provision in Stonehaven

PP194 – The proposed plan (CC/Doc1) should be more prescriptive in addressing the retail deficiencies that exist in Stonehaven. The current LDP solution will exacerbate the problem; there is need for the SDP to address this. A series of DPEA Reporters have now considered the retail problem that exists in Stonehaven. None have resolved it.

Flooding in Stonehaven

PP165 – The town has flooded twice recently. There should be no further development which allows discharge to surface water, as settling ponds will not alleviate the threat.

Modifications sought by those submitting representations:

Support

PP101c – None sought.

Public transport around the Aberdeenshire/Angus border

PP006 – There is a need to consider public transport provision whether by conventional bus services or alternative demand responsive transport for cross-boundary flows into Angus from the Aberdeen - Laurencekirk Strategic Growth Area and the coastal Regeneration Priority Area centred on Inverbervie.

Chapelton of Elsick

PP101d – Increase the housing allowance for the Portlethen – Stonehaven corridor for the 2027 – 2035 from 1000 to 2500 in figure 4 and Schedule 1.

PP124, PP142 – Remove reference to Elsick in para 3.35.

Retail provision in Stonehaven

PP194 – Chapter 3, Strategic Growth Areas, Aberdeen – Laurencekirk, page 20 – 22, should make abundantly clear that the forthcoming Aberdeenshire LDP must deliver a retail site for up to 5000m2 supermarket in Stonehaven – as part of a planned urban expansion.

Flooding in Stonehaven

PP165 – No more development which allows discharge to surface water

Summary of responses (including reasons) by planning authority:

Support

PP101c – Support welcomed

Public transport around the Aberdeenshire/Angus border

PP006 – Most of the issues raised are not strategic in nature and would be an issue to be addressed by development frameworks or masterplans for sites coming forward for development. Development in the southern part of Aberdeenshire is likely to take place over an extended period of time compared to faster rates of growth further north. Stracathro Hospital is only used to a very limited extent from the Grampian area at 300 patients per year (NHS Grampian) and there are no plans to increase the level of admissions. The Scottish Government’s procurement programme for improved broadband provision will apply equally across Scotland and will help to reduce the need to travel, as highlighted in the plan. Cross border public transport provision would need to be discussed with Nestrans and Aberdeenshire Council as it is not a matter directly relevant to the SDP.

Chapelton of Elsick

PP101d, PP124, PP142 – Chapelton of Elsick is a substantial new settlement of over 4,000 homes as well as schools, shops, employment areas, open space and community facilities. It is a sustainable, mixed use proposal which is focused on meeting the needs of the community. Aberdeenshire Council are minded to grant planning permission subject to a legal agreement. The plan makes it clear that the site has the potential to set new standards on the basis of the approved development framework and masterplan. It does not state that it does set new standards. Time will tell in terms of the implementation of the project but the urgent need to improve the quality of new development is set out in paragraph 4.33 of the plan. It is to be hoped that other proposals approved under the plan match or even surpass the quality of Chapelton of Elsick but that is no reason to remove reference to it from the plan.

There is no strategic need (see Issue 6) to increase allocations in the area in the period 2027 – 2035. The site has yet to start on site and its future expansion beyond the initial 4,000 units will be subject to review at a later date.

Retail provision in Stonehaven

PP194 – The proposed plan puts forward the housing and employment land allocations

for the Aberdeen – Laurencekirk Strategic Growth Area (Figure 4). It does not specifically identify the need for a supermarket in Stonehaven but it does not preclude this. Determining the need for and location of any supermarket will be for the Local Development Plan.

Flooding in Stonehaven

PP165 – The Strategic Flood Risk Assessment prepared alongside the Proposed Plan identifies Stonehaven as an area vulnerable to flooding. As highlighted in the Assessment, a flood study is underway for Stonehaven which will explore the use and potential alleviation measures in more detail. In the meantime, paragraph 4.11 of the plan recognises the importance of avoiding flood risk and the need to take it into account in considering the nature and location of new development. This is supported by targets and actions on page 31 of the plan.

New development in Stonehaven will need to address these issues of flood risk. There is no need to amend the plan in response to the representation. More detail is provided in the Aberdeenshire LDP.

Reporter’s conclusions:

Transport around the Aberdeenshire/Angus border

1. No quantitative evidence has been submitted to the examination regarding the level of additional car journeys or the demand for public transport services into or from Angus that may be expected to arise from the development promoted in the proposed plan. However I note that the bulk of the housing allowances for the Aberdeen to Laurencekirk strategic growth area are directed to the Portlethen to Stonehaven area. This area is located some distance from the Angus border. The allowances for the Drumlithie to Laurencekirk area are more modest, though they may be expected to generate some additional demand for local trips into Angus. In addition some development will occur in the local growth and diversification and regeneration areas. I expect the level of such development that will occur close to the Angus border will be modest in scale, but this can be considered in more detail in the local development plan.

2. Regarding travel to Brechin and Stracathro Hospital, road access is provided by the A90 dual carriageway but Tactran state that public transport services are poor. Public transport services to Montrose are better, but there are concerns about road safety and capacity at two bridges over the River North Esk. However, I consider that given the modest levels of growth anticipated for the areas close to the Angus border, there are unlikely to be significant implications for the strategic development plan. Any issues that do arise can be more appropriately addressed at the local development plan or development management stages. These may include the need for local road improvements or improved bus services.

3. Based on the authority’s evidence of the very limited use of the hospital by patients in the Grampian area, I am not convinced that this is an issue which the proposed plan needs to address. This may however be an issue for the relevant health and transport authorities to consider.

Chapelton of Elsick

4. The adequacy of the overall level of the housing land supply is considered under Issue 5. There may be a need to increase the housing allowance for the Portlethen to Stonehaven area to reflect the development aspirations at Chapelton of Elsick in due course. However given the scale and long term nature of this development, and the fact that development is yet to start on site, it is not essential that this is done in this iteration of the plan. The planning authority and the strategic development planning authority do not appear to have yet agreed to an expansion beyond the 4025 homes identified in the local development plan. On balance I conclude that this is a matter that can be reassessed at the time of the next review of the plan.

5. Paragraph 3.35 of the proposed plan refers to the potential of the development at Chapelton of Elsick to set the standard for new development. This statement is an aspirational one: the authority clearly hopes that this development has particular characteristics that offer the potential for it to be an exemplar project. These hopes may be reasonably grounded in the material produced by the promoters of the project to date.

6. From those details of the proposal that are before the examination I see nothing inappropriate in the authority expressing its hope that a particular significant development will be so successful as to provide a new benchmark for development quality. The proposed plan does not state that the development definitely will provide such a standard. Rather it refers to a potential that would reflect the visionary approach which the proposed plan ought to follow. I conclude that no modification is required.

Retail provision in Stonehaven

7. Paragraph 41 of Circular 6/2013: Development Planning expresses Scottish Ministers' expectation that land for shopping will be one of the principal topics for strategic development plans. The proposed plan does contain some general statements of retail policy. For instance, paragraph 4.2 stresses the need to promote retail services to guarantee the vitality and viability of town centres, and confirms the use of a sequential approach. Paragraph 4.40 refers to support for existing retail centres. However these references fall short of the plan-led approach to identifying new retail requirements sought by the representee.

8. Circular 6/2013 also describes the level of detail that strategic development plans are expected to enter into. Paragraph 41 states that the spatial strategy should be specific enough to limit the options available for local development plans to those that would have a broadly similar impact on other planning authorities in the plan area, and on strategic infrastructure and greenspace networks. In this case, the other supermarkets mentioned in the representation as potentially drawing trade away from Stonehaven are both also within Aberdeenshire. There is no suggestion that decisions about supermarket provision in Stonehaven may have a significant impact on retailing patterns within Aberdeen City. Nor have I been made aware of issues affecting infrastructure or greenspace networks relating to retail provision in Stonehaven. In these circumstances I conclude that it is reasonable for the authority to argue that this issue can be satisfactorily dealt with at the local development plan level. I therefore conclude that no modification is required.

Flooding in Stonehaven

9. The strategic flood risk assessment concludes that Stonehaven is one of the

settlements where particular attention will need to be given to flood risk. It also indicates that a further flood study of the River Carron at Stonehaven will be undertaken. In the proposed plan itself, the fifth target on page 31 seeks to avoid developing land which is at an unacceptable risk of flooding except in exceptional circumstances. However this reference does not address the concern of the representee which is about surface water run-off from new developments which may not themselves be at risk of flooding.

10. Paragraph 205 of Scottish Planning Policy states that strategic development plans should, where appropriate, identify major flood protection scheme requirements or proposals and relevant drainage capacity issues. Paragraph 209 refers to the legal requirement for all surface water from most new developments to be treated by a sustainable drainage system. Such measures are to have a neutral or better effect on the risk of flooding both on and off the site. Paragraph 209 goes on to identify it as a responsibility of local development plans to incorporate the legal requirement for sustainable drainage systems.

11. Similar to my consideration above of retail provision, flooding considerations in Stonehaven, while important in themselves, are unlikely to have such cross-boundary or strategic implications as to make it essential to cover this topic in the strategic development plan. The catchment of the River Carron is wholly within Aberdeenshire. As noted above, Scottish Planning Policy specifically identifies requirements for drainage from new development as a topic for local development plans. I therefore consider that it would be more appropriate to address the land use planning aspects of these issues at the local development plan level, and conclude that no modification is required.

Reporter’s recommendations:

No modifications.

Issue 15	Local Growth and Diversification Areas	
Development plan reference:	Chapter 3, Page 22 paragraph 3.38 – 3.45	Reporter: Stephen Hall
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Support</u> SportScotland (PP009) Sigma Capital Group plc (PP023a) Scotia Homes (PP104d)</p> <p><u>Other</u> Sigma Capital Group plc (PP023b, PP024, PP025, PP027c) Barratt East Scotland/Dunecht Estates (PP089) Scotia Homes (PP104e) Fred Olsen Renewables Ltd (PP206c) Fraserburgh Development Trust (PP215b)</p>		
Provision of the development plan to which the issue relates:	Local Growth and Diversification Areas	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p>PP009 – Support the approach outlined in paragraph 3.38 and the role that outdoor recreation can play in this.</p> <p>PP023a - The Spatial Strategy of the Plan recognises that all parts of the Plan area are important and this is welcomed, as is the recognition that all areas are identified for growth (either local or strategic).</p> <p>PP104d – Support the identification of most of Aberdeenshire for local growth (3.38) related to local need (3.42) and the allowances in figure 5.</p> <p><u>Other</u></p> <p>PP023b, PP027c - Ensure that the LDP includes land allocation policies and proposals within the Plan itself and not as supplementary guidance. Specifically identify Aberchirder as a growth area for new residential development and supporting facilities.</p> <p>PP024, PP025 – Support for the overall aim of the plan to provide a range of economic opportunities in a variety of areas. Opportunities should be identified throughout the Strategic Development Plan area which promotes growth in sustainable locations. Particular focus should be given to rural based economic development to encourage sustainable growth and diversification.</p>		

PP089 – If representation PP188 is unsuccessful, changes should be made to Figure 5 and Schedule 1 to accommodate 250 dwellings at Kirkton of Skene. This is a desirable and highly sustainable location for new development.

PP104e – Alford is a well located and serviced settlement with the capacity to grow.

PP206c – It is not clear how renewable energy will integrate into the spatial strategy of the plan, with particular reference to tree cover.

PP215b – A large proportion of the Fraserburgh population travel a long way to work, public transport is limited and there is almost no serviced land or potential sites for employment in the town. Options need to be investigated in the current plan to deal with these issues.

Modifications sought by those submitting representations:

Support

PP009, PP023a, PP104d – None sought (supportive)

Other

PP023b, PP027c - Ensure that the LDP includes land allocation policies and proposals within the Plan itself and not as supplementary guidance. Specifically identify Aberchirder as a growth area for new residential development and supporting facilities.

PP024, PP025 – Specifically promote sustainable growth of rural employment hubs such as Aberchirder to sustain jobs, population and encourage growth and promote diversification.

PP089 – Changes should be made to Figure 5 and Schedule 1 to accommodate 250 dwellings at Kirkton of Skene. This is a desirable and highly sustainable location for new development.

PP104e – None suggested.

PP206c – Although increasing tree cover is important for a variety of reasons including environmental, economic, social and community benefits (page 22, paragraph 3.40), this should be balanced with the competing interest of renewable energy. The Scottish Government targets in relation to increased tree cover should be balanced with the Scottish Government renewable energy targets. We do however, not anticipate that there should be any conflict between reaching targets for additional tree cover and increasing renewable energy development.

PP215b – Look at improving all transport options, including a rail link to Fraserburgh and sites for development identified and serviced.

Summary of responses (including reasons) by planning authority:

Support

PP009, PP023a, PP104d – Support welcomed

Other

PP023b, PP027c – Land allocations are made through the Local Development Plan rather than the Strategic Development Plan and there is no need to be more specific in the SDP. It would not, therefore, be appropriate to specifically mention Aberchirder, it is the Aberdeenshire Local Development Plan which will assess the need and capacity for growth in this settlement.

PP024, PP025 – Support for the aim to encourage growth in a variety of locations across the SDP area is welcomed. Sustainable patterns of development are encouraged throughout the proposed plan and focussing the strategic growth areas along key road and rail transport routes is an integral part of this. Most of the landmass in Aberdeenshire falls within a local growth and diversification area, these have been designated to encourage growth within individual settlements which relate to local needs. However, para 3.42 on page 22 (CC/Doc 1) states that the scale of growth will vary from place to place depending on the localised need and priority will be given to mixed use developments which will include a proportion of employment land. The plan is supporting sustainable growth, including opportunities for new employment within Local Growth and Diversification Areas, so long as it is compatible with local needs and circumstances.

PP089 – A site of 250 homes as an extension to a small village in the local growth and diversification area would not be consistent with the strategy of the SDP. The scale of growth would not relate to local needs in Kirkton of Skene (para 3.42)

PP206c – Increasing tree cover is not incompatible with renewable energy as both are required for climate change mitigation (as highlighted in the representation). Paragraph 3.40 already explicitly recognises the competing interests for land. No change is required.

PP215b – As well as being identified as a regeneration priority area, Fraserburgh is also within the local growth and diversification area. Paragraph 3.39 makes it clear that encouraging employment growth in such areas is vital to make them more sustainable and reduce the need to commute. Paragraph 3.41 emphasises the need to improve road links to the northern coastal communities such as Fraserburgh while a target on page 26 requires Aberdeenshire Local Development Plan to identify and maintain an appropriate supply of business land in the area. The Aberdeenshire Local Development Plan (2012) made provision for an additional 20Ha of employment land in Fraserburgh on top of the existing supply (CC/Doc 6g, page 58). Options for a rail link are fundamentally a matter for the Regional Transport Strategy rather than the SDP. It is the local development plan and regeneration strategy which will be the main driver for these actions rather than the SDP, although it does set an appropriate strategic context.

PP104e – Allocations to individual settlements is a matter for the Aberdeenshire LDP.

Reporter's conclusions:

1. A number of representations highlight particular sites or settlements in the local growth and diversification areas that are argued to be suitable for accommodating further development, including Aberchirder, Kirkton of Skene and Alford.
2. The strategy of the proposed plan is to focus most development within the identified strategic growth areas. The strategy for the local growth and diversification areas is for growth in individual settlements to relate to local needs. The housing allowances for

these areas given in Figure 5 are relatively modest. Whether this strategy is appropriate, whether the geographical extent of the strategic growth areas has been correctly identified, and whether the overall level of growth is correct are discussed under Issues 10 and 5.

3. Given the modest housing allowances identified for the local growth and diversification areas, it is unlikely that the precise location of the limited amount of new housing development that is expected to occur in these areas will have significant cross boundary implications. It is not therefore necessary for the strategic development plan to take a view as to which settlements within these areas should accommodate growth. Rather, the potential of individual settlements within these areas to accommodate development is a matter that can appropriately be considered in the Aberdeenshire Local Development Plan.

4. This strategic development plan does not generally take a site-specific approach. It is not therefore appropriate for me to consider the merits of individual sites. However, as already noted, the intention of the local growth and diversification areas is to accommodate levels of growth related to local needs. The development proposed at Kirkton of Skene, regardless of its possible advantages, appears to be of a scale intended to meet a regional demand beyond that generated in this village. It is therefore not appropriate to make any reference to it in the plan, or to change the allowances in Figure 5 to accommodate this development proposal.

5. It is suggested that the plan should specifically promote rural employment hubs. Paragraph 3.39 of the proposed plan refers to encouraging employment growth in the local growth and diversification areas as being central to making them more sustainable and reducing commuting. The proposed plan therefore already contains a supportive policy context for employment development in rural areas. While the plan could have contained more detail on the types and locations of employment development that are preferred, it is not clear to me that this matter gives rise to such significant cross-boundary implications as to require inclusion in the strategic development plan. I therefore conclude that no modification is required.

6. The way in which policy material is to be split between the local development plans and supplementary guidance is primarily governed by the provisions of regulation 27(2) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 (augmented by paragraph 139 of Circular 6/2013: Development Planning). This requires supplementary guidance to deal only with the provision of further information or detail in respect of policies or proposals set out in the strategic or local development plan. Given these legal requirements, it is unnecessary for the strategic development plan to specify further how policy material is to be split between the local development plan and supplementary guidance.

7. Regarding the balance between increasing tree cover and the use of land for renewable energy, both the representee and the authority are of the view that there need not be a conflict. Paragraph 3.40 of the proposed plan already recognises that a balance may need to be struck, in stating: "There is a clear potential to increase the tree cover of this area while respecting competing interests for land". While there will be some locations where renewable energy and woodland may be alternative uses for the same piece of land, there will be others that are suitable for one of these uses but not the other. I therefore agree that there need be no conflict, and that this matter is covered adequately in the proposed plan.

8. Specific regeneration activities in Fraserburgh will be an important issue locally. However it is unlikely to be necessary to specify these in detail in the strategic development plan unless there are particular actions which may have a wider impact across the region. It is more likely that the planning issues associated with the regeneration of the town can be satisfactorily addressed in the local development plan. In this vein, the authority refers to the Aberdeenshire Local Development Plan's identification of additional employment land in Fraserburgh.

9. The proposed plan generally takes a high level approach to planning issues in the local growth and diversification areas and regeneration priority areas. This includes a recognition of the need to diversify and grow the economy of these areas, encourage employment growth and reduce the need to commute (paragraph 3.39). These aims reflect the concerns raised in the representation from Fraserburgh Development Trust. I therefore conclude that the matters raised in this representation are already broadly covered in the plan, and that including further detail specific to Fraserburgh is unnecessary.

10. If a proposal to re-establish a rail link between Aberdeen and Fraserburgh or Mintlaw were to be taken forward, this would be a strategic matter that I would expect to be promoted in the strategic development plan. However, there is no evidence before the examination to indicate whether or not such a link is a realistic prospect. I therefore conclude that this is not a matter that should be included in the strategic development plan at the current time.

Reporter's recommendations:

No modifications.

Issue 16	Regeneration Priority Areas	
Development plan reference:	Chapter 3, Page 23 paragraph 3.46 – 3.53	Reporter: Scott Ferrie
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Banff & Macduff Community Council (PP084) Fraserburgh Development Trust (PP215a) Old Aberdeen Community Council (PP221) Byron McKibben (PP225b)</p>		
Provision of the development plan to which the issue relates:	Regeneration Priority Areas	
Planning authority's summary of the representation(s):		
<p>PP084, PP221 – There is a lack of specific targets for the Regeneration Priority Area.</p> <p>PP215a – There needs to be a definition of what is meant by regeneration in the glossary.</p> <p>PP225b – The southern Regeneration Priority Area should be deleted as it performs poorly against few of the Scottish Index of Multiple Deprivation criteria, designation threatens its existing economic assets such as tourism and Aberdeenshire Council's emerging regeneration strategy appears to be focusing elsewhere.</p>		
Modifications sought by those submitting representations:		
<p>PP084 – A specific target on page 23 of the SDP should be included such as “to make sure that at least 50% of the Actions listed in updated Regeneration Plans for each town or rural community of the Regeneration Area, will be completed by 2015, and that at least another 25% have been started beyond a study stage.”</p> <p>Further, that there should be an Objective to start the Regeneration priority area page, such as “to holistically reverse the economic, physical and social decline of places where market forces alone won't suffice” Whether this Objective is achieved over time can presumably, at least in part, be answered for each community by the SIMD figures.</p> <p>PP215a – There needs to be a definition of what is meant by regeneration in the glossary.</p> <p>PP221 – As a minimum there should be a meaningful target date for the issue of the regeneration strategy document.</p> <p>PP225b – Delete “and south” from para 3.47 [and para 3.52] as well as the hatching in the diagrams on pages 9, 11, 21, 30, 43 and 45.</p>		

Summary of responses (including reasons) by planning authority:

PP084, PP215a, PP221, PP225b – Paragraph 3.47 identifies improving the economy, environmental quality, accessibility, employment opportunities and the competitiveness of business as key elements of regeneration. This is a wide perspective and in line with that expressed in the representation. In light of this, there is no need for an additional glossary entry.

The plan makes clear that the areas in need of regeneration have been identified in a broad way (para 3.47) and are focused on the needs of existing communities. They are areas which share common characteristics but differ in other important respects, demanding a response appropriate to the particular area (para 3.48). The SDP does not suggest they should all be treated in the same way. While the scale of the challenges in the southern Regeneration Priority Area are not as great as in the north of Aberdeenshire (hence the initial priority being given to Fraserburgh in terms of council funding over the next five years), challenges around accessibility to jobs and services do exist. Rather than tourism being threatened by Regeneration Priority Area designation, tourist development is one of the opportunities identified in para 3.53.

The suggested targets for Regeneration Priority Areas are too specific and ill-defined for the SDP. Individual regeneration strategies and action plans will be appropriate for these areas and they should contain their own targets. The inclusion of dates which fall in advance of the approval of the SDP would not add value to the plan.

Reporter’s conclusions:

1. As with other parts of the proposed plan, much of this section has been rolled forward from the current structure plan. In that context I consider that circumstances would need to have demonstrably changed in order to justify modification of the proposed plan. I take some limited support, in reaching this finding, from paragraph 68 of Circular 6/2013: Development Planning which states, in relation to main issues reports, that: “Content that the authority proposes to retain in the Proposed Plan from the existing plan...should be identified in the MIR but with limited discussion.”

2. Although sitting within The spatial strategy section of the plan, as is the case with the current structure plan, there appear to be no targets set specifically for the regeneration priority areas. The inclusion of specific targets would clearly enhance monitoring of the effectiveness of the plan. I consider, however, the specific target proposed in representations to be potentially meaningless, as it seeks to measure unspecified actions in other plans or strategies, some of which are currently being developed. Similarly, I do not consider that the proposed objective would add value to this section of the plan.

3. Paragraphs 3.50 and 3.51 refer to the current position in regard to regeneration frameworks across the 2 council areas. I do not consider it appropriate that this plan should include targets for completion of those frameworks as, although complementary, they sit outwith the statutory development planning system.

4. I am satisfied that the final sentence of paragraph 3.47 adequately defines the scope of actions required under this heading and that in this context there is no need for a glossary definition of ‘regeneration’.

5. I accept the authority’s argument that the regeneration areas have been identified in a broad manner, that the characteristics of those areas vary significantly, and that consequently the regeneration approach will require to be tailored to address those differing characteristics. I have no evidence to lead me to conclude that the characteristics of the southern regeneration priority area are such that designation as a regeneration priority area is not appropriate. In addition, I see no tension between such a designation and the promotion of tourism in that area. Rather, I note that the further development of tourism in the regeneration priority areas is specifically referred to in paragraph 3.53.

Reporter’s recommendations:

No modifications.

Issue 17	Miscellaneous	
Development plan reference:	General Document	Reporter: Scott Ferrie
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>General Support</u> Angus Council (PP150) The New Aberdeen Mosque & Community Centre Project (PP151a, PP152a, PP153a)</p> <p><u>Crime Reduction and Safety</u> Grampian Police (PP001)</p> <p><u>Infrastructure Support</u> George Ingram (PP050a, PP050e) Old Aberdeen Community Council (PP219)</p> <p><u>The ‘Hinterland’</u> George Ingram (PP050b)</p> <p><u>Rural economy</u> George Ingram (PP050c)</p> <p><u>Weak Administrations within the Local Authorities</u> George Ingram (PP050f)</p> <p><u>Safeguarding land for transport proposals</u> Union Square Developments Ltd (PP129)</p> <p><u>Freight Transport</u> Rail Freight Group (PP099)</p> <p><u>Timing of proposed plan preparation</u> RES UK & Ireland (PP154)</p> <p><u>Accessibility Objective</u> Polmuir Properties (Newtonhill) Ltd (PP136) NHS Grampian (PP213i) Scotia Homes (PP134i) SportScotland (PP008)</p> <p><u>Style and content</u> Scotia Homes Ltd (PP131, PP104) Stewart Milne Homes (PP110) Scottish Retail Properties Ltd Partnership (PP166d) Old Aberdeen Community Council (PP218) Homes for Scotland (PP227a, PP228) Bancon Developments Ltd (PP246c)</p>		

<p>Provision of the development plan to which the issue relates:</p>	<p>General Document</p>
<p>Planning authority's summary of the representation(s):</p>	
<p><u>General Support</u></p> <p>PP150 – General support for the overall content of the plan. A report outlining this position is enclosed.</p> <p>PP151a, PP152a, PP153a – General support for what the proposed plan (CC/Doc1) stands for and its inclusive vision which represents a shared future.</p> <p><u>Crime Reduction and Safety</u></p> <p>PP001 – The plan should reflect the desire to reduce crime through encouraging good design, which has safety in mind. Partnership working should be addressed to ensure community safety is adequately considered.</p> <p><u>Infrastructure Support</u></p> <p>PP050a – Lack of Scottish Government lead support for infrastructure in the region.</p> <p>PP050e – Para 3.2: Lack of link road networks beyond the central route through Aberdeen City Centre.</p> <p>PP219 – It is important to consider both Aberdeen City and Aberdeenshire when upgrading the broadband infrastructure. Many areas within Aberdeenshire still rely on dial up broadband and if this is not improved it will deter people from living in rural locations.</p> <p><u>The 'Hinterland'</u></p> <p>PP050b – <i>“Para 1.4: Danger of neglecting the 'Hinterland' at the expense of the plan”.</i></p> <p><u>Rural Economy</u></p> <p>PP050c – The loss of rural shops and services will impact on the local community and will result in the loss of business rates.</p> <p><u>Weak Administrations within the Local Authorities</u></p> <p>PP050f – If the local economy is healthy, why do we have such weak administrations at local government level? Concerns over recent and future financial cutbacks in the public sector and the implications this will have on services and Local Government structures.</p> <p><u>Safeguarding land for transport proposals</u></p> <p>PP129 – In relation to local development plans the SDP must provide sufficient flexibility to allow planning authorities to review and potentially reallocate land previously earmarked for transport use where there is no reasonable prospect of such use coming to fruition. One such case is the rail freight facility provided by USD at Raiths Farm, Dyce.</p>	

There is a sound case for reallocating some of the land at this location from transport to employment uses and the SDP should provide the appropriate context within which this can take place through the local development plan process.

Freight Transport

PP099 – The proposed SDP supports modal shift to rail freight but should go further in encouraging the link between land use and freight transport.

Timing of proposed plan preparation

PP154 – The proposed plan (CC/Doc1) should not have been published for consultation until after the NPF3 Main Issues Report and Draft SPP (SuppSDP/Doc2 and SuppSDP/Doc1 respectively) had been published. These national planning policy revisions will have implications for the proposed plan and publishing the proposed plan before these could result in significant alterations having to be made to the SDP.

Accessibility Objective

PP136, PP134i – The stated objectives are supported and it is considered that further Greenfield land releases are required to meet the stated objectives/targets.

PP213i - NHS Grampian welcomes the identification of targets to meet the accessibility objectives of the plan. Healthcare facilities must be equally accessible by foot, cycle and public transport and as such, they require to be considered as an integral component of new development. In this regard it would have been helpful to include an additional target seeking to ensure that all new developments are easily accessible to public facilities and services (including health care). This would ensure that developers have regard to the requirement to consider proximity to leisure, recreation and public facilities prior to progressing the development of a site. Leisure and recreation have proven health benefits and require consideration.

PP008 – Reference to walking and cycling networks on pages 38 and 39 should identify sports and recreation and not give the impression that cycle routes and core paths have only functional uses. It is important to identify that functional and recreational provision are often the same.

Style and content

PP110 – Further policies should be added to the SDP for ease of use and compliance with legislation. There should be at least one policy for every section of the plan.

PP131, PP227a, PP228, PP246c, PP104j – Support for the general approach of the Proposed SDP. However, would prefer a more ‘policy’ directed approach within the SDP. Firm policy direction is suggested to direct the relevant Local Development Plans (LDPs).

PP166d – The style of the graphics in the detailed diagrams in the plan is not sufficiently clear to allow users to interpret the content. The diagrams within the current structure plan are preferred as they provide greater clarity and are less open to interpretation.

PP218 – The proposed plan (CC/Doc1) is full of ‘purple prose’ but short on meaningful targets. The response form is not conducive to public response.

Modifications sought by those submitting representations:

General Support

PP150a, PP151a, PP152a, PP153a – None sought.

Crime Reduction and Safety

PP001 – Requested that the third supporting aim (para 2.2) ends with: *“where safety and the desire to collectively design out and reduce crime are comprehensively embedded across all sectors”*.

Para 3.16 - New final sentence sought – *“Enhancing the safety of all that live, work or visit these developments will be one of the central strands that underpin our work, for without safety one cannot have a truly buoyant, vibrant economy”*.

Para 3.21- New second sentence sought - *“The principles of crime prevention through environmental design need to be acknowledged by all participating partner agencies to ensure that community safety is woven across all areas of the regeneration process”*.

Para 3.22 - Addition to final sentence which ends: “There is more detail about the regeneration priority area below” suggested addition - *“but liaison with Police Scotland Architectural Liaison Officer should occur at the planning stage and ‘Secured Design’ accreditation needs to be considered for all new significant industrial and residential developments”*.

Para 4.2 - Requested additional sentence after third sentence – *“By ensuring that all opportunities are taken to proactively enhance safety through closer partnership working we can help create the necessary conditions that will underpin this ambitious development programme.”*

12th bullet point, Schedule 2, pp 44 – Addition at end of bullet point – *“working with partners and considering all supporting contributory factors that need to be incorporated to ensure sustainable development”*.

Infrastructure Support

PP050a. PP050e – None suggested

PP219 – An additional target in para 4.5 after final target: *“That greater than 99% of all domestic properties throughout Aberdeenshire should be able to access broadband at a download speed of at least 2Mb/s by 2020”*.

Safeguarding land for transport proposals

PP129 – At Page 39, first bullet point, after “Local development plans will” insert “review land allocations for transport projects and, where appropriate, will”. Also insert new second sentence to read “Consideration will also be given to the reallocation of land previously identified for transport use where there is a sound case for promoting other productive uses.”

Freight Transport

PP099 – Amend page 38 to explicitly encourage major manufacturing, processing or logistics developments to locate adjacent to or convenient for existing or potential rail freight facilities.

Timing of proposed plan preparation

PP154 – Retrospective, nothing that can be altered now.

Accessibility Objective

PP134i, PP136 – Further Greenfield land releases are required to meet the stated accessibility objectives/targets.

PP213i – An additional target, within the targets for objective, page 38 of the plan (CC/Doc1) in relation to all new developments being easily accessible to public facilities and services.

PP008 – In promoting walking and cycling in the SDP it is essential to take an integrated approach that recognises that functional and recreational provision is most often the same thing and should be promoted in an integrated way. It would be useful for the SDP to make specific recognition of this.

Style and content

PP104j, PP110, PP131, PP227a, PP228, PP246c – Firmer policy direction is suggested to direct Local Development Plans, at least one policy for each section of the plan (PP110).

PP166d –The detailed diagrams within the current structure plan are preferred as they provide greater clarity and are less open to interpretation.

PP218 – Clarity and brevity would make the report much easier to understand.

Summary of responses (including reasons) by planning authority:

General Support

PP150, PP151a, PP152a, PP153a – Support welcomed.

Crime Reduction and Safety

PP001 – We recognise that striving for safer places through better quality design is an extremely important issue. However, the comments made are not most appropriately addressed at the SDP level.

The third supporting aim of the plan (CC/Doc 1), paragraph 2.2 supports and encourages the highest standard of urban and rural design; this is sufficiently addressing issues of good design at the strategic level. Issues of creating safer places through better design principles are addressed at the local level through both Local Development Plans. Aberdeenshire Council address this through Planning Advice – *Sitting and Design on*

New Developments (SuppSDP/Doc 14) paragraph 5, page 2 and Aberdeen City through their Local Development Plan (CC/Doc 7), Policy D2, page 185. Planning Advice Note 77, *Designing Safer Places* (SuppSDP/Doc7) paragraph 3, states that it is to be of consideration to Local Authorities, Developers and the Police. It does not make reference to how it can be utilised at SDP level. It is neither necessary nor appropriate to address reducing crime through the specifics of design at the SDP level.

Partnership working is encouraged throughout the plan but the type of liaison suggested in the response would be most appropriately addressed at the local level at the planning application stage.

Infrastructure Support

PP050a – In terms of Scottish Government infrastructure support, the plan has no control over this.

PP050e – With regard there being no link road network proposals other than through Aberdeen, the plan highlights that development is key to improving infrastructure throughout the region. An integral component of this will be the progression of the Aberdeen Western Peripheral Route which the plan highlights throughout sections on Strategic Growth Areas; Regeneration Priority Areas and within Schedule 2 Proposals.

PP219 – The proposed plan (CC/Doc1) recognises the importance to the region of improving the telecommunications infrastructure. Para 4.4 highlights that the roll out of superfast broadband throughout the plan area will be a key priority. An Aberdeenshire Council Press Release was published on 1 May 2013 (SuppSDP/Doc2) and gives an overview of a recent Shire wide survey into the demand for broadband throughout the region. It states a target for Aberdeenshire Council to exceed the National commitment by providing a better than 2Mbps service to all areas within the region by 2015.

The 'Hinterland'

PP050b – It is unclear exactly what point the representation is making. If the point relates to neglecting Aberdeenshire at the expense of Aberdeen City, then the plan quite clearly addresses key regional issues within both Aberdeen City and Aberdeenshire. If the reference is concerned about areas which fall outwith the plan's geographical remit, then this is the concern of neighbouring authorities.

Rural Economy

PP050c – The section on Local Growth and Diversification will support local economies many of which are in rural locations. The reference to business rates will not have direct implications at the local administration level as they are not received at this level and go to the Treasury to be redistributed.

Weak Administrations within the Local Authorities

PP050f – While Local Government economic cutbacks have implications for the SDP and should be recognised, this issue is not something which should be explicitly addressed within the context of a Strategic Development Plan.

Safeguarding land for transport proposals

PP129 – The wording in the first bullet on page 39 is appropriate. The current text only requires protection from other forms of development for transport proposals identified in local and regional transport strategies. If such proposals were dropped from local and regional transport strategies there would be no need for continued identification and protection. If it is considered that too much land has been protected in a particular location, this is properly a matter for local development plans and does not require an amendment to the SDP. However, it is properly the place of local and regional transport strategies to determine the need for projects rather than just the LDPs.

Freight Transport

PP099 – Although the representative seeks an amendment in the accessibility section on page 38, the appropriate place would be the economic growth section of the plan (p24 – 26). Paragraph 4.5 already highlights the importance of transporting freight by rail and sea.

Timing of proposed plan preparation

PP154 – The proposed plan (CC/Doc1) was prepared in the context of the current SPP and NPF2. NPF3 is currently out for consultation on the MIR and SPP at draft stage, therefore, neither of them have been published in their final format. Given this fact, it would not be appropriate for them to inform the content of the proposed plan. SPP is not expected to be published in its final format until the end of 2013 (SPP Participation Statement, SuppSDP/Doc3, para 8). NPF3 which has a statutory requirement and will be subject to parliamentary scrutiny, is not expected to be published in its final format until June 2014 (NPF Participation Statement SuppSDP/Doc4, para 17). For the proposed plan to have been legitimately influenced by either of these documents would have resulted in the preparation of the plan being delayed by over a year. This would have meant that Aberdeen City and Shire SDPA were not meeting the legislative requirements of the Planning etc (Scotland) Act 2009 under s10(8) which states that a proposed SDP must be submitted to Scottish Ministers within 4 years of the approval date of the current plan. Whether the period of representations for the proposed plan had taken place after the publication of these national documents would not have made a significant difference, as they themselves are still consultation documents and beyond public scrutiny may be subject to change.

Accessibility Objective

PP134i, PP136, PP213i, PP008 – The release of additional greenfield housing sites is unrelated to meeting the objectives and targets of the accessibility section of the plan (page 38).

Chapter 4, objective 6 of the plan (CC/Doc1) is concerned with accessibility primarily in relation to strategic access routes into and throughout the region, which will have an impact on how accessible important healthcare facilities within the region are to different communities. However, ensuring that new developments have access to public facilities and services is more related to objective 5 – Sustainable Mixed Communities, in which it is stated (para 4.34) the importance of focusing on mixed use developments, where different land uses will include, among others, education; health and leisure. Para 4.38 states that the plan will not support development which fails to provide access to these

vital services and facilities. Para 5.7 recognises the need to invest in services and facilities for communities which will meet the scale of growth proposed. Active travel is promoted throughout sections on Strategic Growth Areas and Accessibility and as stated in the plan, has health as well as environmental benefits. The importance of sports and recreation within the context of walking and cycling is recognised. However, it is not for the SDP to state all the potential uses of the strategic walking and cycling routes proposed, and it would not be of benefit to identify just one.

Style and content

PP104j, PP110, PP131, PP166d, PP218, PP227a, PP228, PP246c – The proposed plan (CC/Doc1) has a Crystal Mark from the Plain English Campaign. The plan, as required by Circular 1/2009, is a concise document (48 pages in total), which includes a number of maps and pictures to make it as visually accessible as possible. This is in line with Scottish Government requirements. The response form allows for a summary and detail of issue to be made, as well as any changes sought to be outlined, this would seem suitably accommodating.

The plan contains clear direction to LDPs where this is required through the use of the policy material within the text of the plan itself, as well as the targets and actions contained within the plan. No examples are provided of where this approach fails to provide an appropriate context for LDPs. The ‘quote’ provided in one representation (PP110) is not from the Planning etc (Scotland) Act 2006, the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 or Circular 1/2009 and its source is unclear. However, Circular 1/2009 does contain a similar paragraph which does not support the objection to the plan being made... “[t]he principal *topics* for SDPs are expected to be land for housing, business, shopping and waste management development, strategic infrastructure (including transport, water supply and waste water) and strategic greenspace networks (including green belts)” (CC/Doc 9, para 14). The plan was written in roughly the same format as the previous structure plan (CC/Doc2), approved by Scottish Ministers in August 2009.

The detailed diagrams within the proposed plan were not present in the structure plan and are designed to enhance the spatial strategy section of the plan. They use the same graphic style as the Main Issues Report for National Planning Framework 3 (SuppSDP/Doc2). No examples have been provided of particular problems caused by the graphics.

Reporter’s conclusions:

Crime Reduction and Safety

1. I agree in general terms with the authority that matters of crime reduction and safety are more appropriately addressed at the local development plan and development management levels. I note that those matters are currently addressed by Aberdeenshire Council by means of formal Planning Advice, and by Aberdeen City Council in its local development plan.

2. Crime reduction and safety is not listed in paragraph 41 of Circular 6/2013: Development Planning as a principal topic for strategic development plans. That is not to preclude consideration of these issues where strategic-level policy could usefully be provided. I have carefully considered the suggested modifications and am satisfied that

these matters are already being appropriately addressed at local development plan / formal planning advice level. In that context I conclude that the suggested modifications would not add to the value of the plan to any significant degree.

Infrastructure Support

3. One representation refers to a perceived lack of Scottish Government support for (non-specified) infrastructure throughout the plan area. Scottish Government investment decisions cannot be dictated by the proposed plan, but strategic infrastructure investment decisions generally are intended to be guided by strategic development plans. In this regard I note that the Aberdeen Western Peripheral Route, being jointly funded by the Scottish Government and the 2 councils, is highlighted in the proposed plan as supporting growth throughout the plan area.

4. As I have found separately under Issue 3, the provision of high-speed broadband is essential if especially those rural parts of the plan area are to remain desirable places to live and work in. The authority advises that the 2 councils are currently focussed on such provision in existing households. I find that the broadband target on page 25 appropriately refers only to new development, where the plan is likely to have the most significant influence.

The 'Hinterland'

5. There is a perceived "danger of neglecting the 'Hinterland' at the expense of the plan." It seems to me that the proposed plan provides an appropriate strategic framework for the growth and diversification of the rural parts of the plan area, as it does for the city. If the reference is to areas outwith the plan area, that is outwith the scope of this examination.

Rural Economy

6. Under Local growth and diversification areas, the proposed plan seeks to provide for development to meet the needs of existing communities. Such local growth should clearly assist in maintaining demand for rural shops and services, ensuring that these facilities continue to be provided.

Weak Administrations within the Local Authorities

7. The nature of council administrations in the plan area, as well as public sector funding levels, is outwith the scope of this examination.

Safeguarding land for transport proposals

8. I agree with the authority that the first bullet point on page 39 is appropriately worded. It makes it clear that land required only for those transport proposals identified in local and regional transport strategies is to be identified and protected in local development plans. It follows that if such projects are removed from those strategies, land need not be reserved for them in the local development plan. Similarly, adjustments to the boundaries of such sites is properly a matter for consideration at local development plan stage, and I can see no need for this plan to include such a requirement.

Freight Transport

9. I note that paragraph 4.5 supports freight being transported by rail and sea. In addition, the 3rd bullet point on page 39 requires that the spatial strategy directs development to areas that can be accessed by more sustainable transport options. I am satisfied that these provisions adequately provide for development likely to optimise use of rail freight facilities.

Timing of proposed plan preparation

10. It is contended that publication of the proposed plan ought to have been delayed until after publication of the NPF3 Main Issues Report and the draft Scottish Planning Policy. I appreciate that there is every possibility that NPF3 and Scottish Planning Policy, when approved, are likely to have significant implications for the next iteration of the strategic development plan. The NPF3 Main Issues Report and the draft Scottish Planning Policy would to some extent have been material considerations had the proposed plan been delayed pending their publication. I agree entirely with the authority, however, that those consultation documents could not have fully informed the content of the proposed plan.

11. It has in any event transpired that the finalised versions of NPF3 and Scottish Planning Policy are not likely to be approved until June 2014 at the earliest. Scottish Ministers place great emphasis on development plans being kept up to date. In addition, the authority correctly points out that any significant delay in publishing the proposed plan, to take account of those documents, would not have been in accord with the statutory requirement that the proposed plan be submitted to Scottish Ministers within 4 years of approval of the current structure plan.

Accessibility Objective

12. I consider the scale of housing land release more generally under Issue 5. There is no evidence before me that the scale of greenfield land release is insufficient to support the Accessibility objective and targets.

13. I appreciate that the provision of healthcare and other services within sustainable mixed communities is appropriately referenced in page 36 of the plan. It seems to me though that those provisions of the plan which the authority has referred me to are concerned with ensuring that an appropriate range of services and facilities is *provided* within such communities.

14. The Accessibility objective seeks to ensure that new development contributes towards reducing the need to travel and increasing the attractiveness of public transport and active travel. I find that this adequately expresses the intention that new development be as conveniently sited in relation to existing facilities (including healthcare) as possible.

15. Walking and cycling networks can clearly be utilised for a variety of purposes. I do not consider it necessary that the plan specifically identifies sports and recreation as one of these.

Style and content

16. The proposed plan clearly expresses a vision and spatial strategy, supported by a series of objectives and targets. There is no dispute that it differs from the orthodox in regard to lack of policies for each topic. It is contended in one representation that this fails to comply with the Act and Circular 1/2009 (now Circular 6/2013), which both require *policies* on a range of matters. I have been directed to, and can find, no such specific requirement in either the Act or the circular. Instead, paragraph 14 of Circular 6/2013 lists matters, described as *topics*, which are to be addressed in strategic development plans.

17. The framework of vision and spatial strategy, supported by a series of objectives and targets, has been rolled forward into the proposed plan from the current structure plan. I can see no clear change in circumstances which would justify upsetting this framework. I note the contention that a lack of policies for each topic, providing clear direction, caused difficulties in the preparation and examination of local development plans following on from the current structure plan. That contention has not been evidenced and I would find it odd, had that been the case, that both councils would have allowed the authority to pursue a similar framework in the context of the proposed plan.

18. The plan is also criticised for being heavy on prose, with few targets. Explanatory text is inevitable in such a document, indeed desirable, and I am satisfied overall that the plan is concise, as required by Circular 6/2013. I am also satisfied that there are quantifiable targets where appropriate.

19. Finally, there is criticism of the lack of clarity in diagrams, which are compared unfavourably to those in the current structure plan. The detailed diagram for Area 1: *Aberdeen City* is cited in this regard. I am satisfied that that diagram, in the context of a strategic development plan, is clearly legible and that, if anything, it provides a more detailed indication of proposals for the Aberdeen City Strategic Growth Area than does the key diagram in the current structure plan.

Reporter's recommendations:

No modifications.