

[REDACTED]

From: [REDACTED]
Sent: 10 May 2018 14:02
To: Tom Walsh; Claire McArthur
Subject: FW: Comments on Main Issues Report 2018
Attachments: Aberdeen City and Shire Strategic Development Plan 2018 Submission CBMCC.docx

Claire McArthur
Team Leader (Acting)
Aberdeen City and Shire SDPA

Direct Dial: 01467 539734
claire.mcarthur@aberdeenshire.gov.uk
www.aberdeencityandshire-sdpa.gov.uk

Working Days: Tuesday – Friday



From: Peter Roberts [mailto:roberts.peter53@gmail.com]
Sent: 10 May 2018 13:11
To: [REDACTED]
Subject: Comments on Main Issues Report 2018

Please see the attached file which presents the views of the Cults, Bieldside and Milltimber Community Council, Aberdeen on the 2018 Main Issues Report for the Aberdeen City and Shire Strategic Development Plan.

Regards,
Peter Roberts

Aberdeen City and Shire Strategic Development Plan – Main Issues Report 2018

Cults, Bieldside and Milltimber Community Council, Aberdeen

Contact Details:

Peter Roberts

Planning Liaison Officer - Cults, Bieldside and Milltimber Community Council

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please use to keep in contact re progress of SDP

Tel: 01224868524

Responses to the questions and points raised in the 2018 Main Issues Report.

Q1. Vision. The updated vision set out in the preferred option is acceptable, however it is not clear how the updated vision is any different in regard to “resilience applies to social and environmental issues” – the words used addressing that aspect are identical to the last published vision. It is also suggested that the use of “courageous” in front of decisions is superfluous – we expect the councils to make the right decisions for the residents of the City and Shire. The extra clarity on which industries require focus is helpful.

Q2. Spatial Strategy. We agree with the Preferred Option that the existing spatial strategy remains fit for purpose as long as it is clearly recognised and stated within that option that growth along the A93 and A944 corridors above currently approved development plans is not supported until the transport and other infrastructure challenges (e.g. schooling, medical services) are better understood and addressed. We would prefer to see development along corridors with green space maintained between corridors rather than uniform growth of the city out towards the AWPR. This would make it easier to provide viable public transport services. For the same reason housing development should not be allowed to stray too far from the corridor spine as this simply encourages a default to car use.

Q3. Aberdeen Western Peripheral Route. We agree with the Preferred Option to protect the junctions of the Aberdeen Western Peripheral Route from inappropriate speculative development, not only for the reasons set out but also because the option would be aligned with Aberdeen City plans to attract and retain businesses in the city centre. We would not wish to see major development proposals come through anything other than a full and open development plan process.

Q4. Regeneration. We are neutral to the proposal that the new plan should focus on the towns of Banff, Macduff, Fraserburgh and Peterhead for regeneration. While Aberdeen City has developed a masterplan for the city centre, it should not be forgotten that there are several areas of Aberdeen which sit outside the city centre and which are in need of regeneration to improve the quality of life for those residents. These should be identified within the Strategic Plan.

Q5. Economic Growth. We believe the Strategic Plan should be based on a realistic view of future economic growth rather than an optimistic view. Incorporating flexibility is one thing, the use of optimistic views and forecasts tends to lead to a failure to deliver and disappointment. It will also encourage more development proposals than needed for the area. Conversely an over-pessimistic view leads to stagnation. We support the inclusion of new transport infrastructure associated with Aberdeen Harbour expansion in the Strategic Plan, and in the Aberdeen Local development Plan.

Q6. Employment Land. We agree with the Preferred Option that the new plan should delay releasing safeguarded employment land until after 2030 and look at improving existing employment areas for future use.

Q7. Tourist Development. We agree in principle with the Preferred Option that the new plan should take a stronger and more flexible approach to long-term tourist development however it will be important to see what specific measures and approaches are being proposed, other than “being flexible”.

Q8. Planning System and Economic Growth. Much has been said and submitted to the Scottish Government about how the planning system could be improved. Unfortunately it appears much of what the public wish to see has fallen on deaf ears but we are hopeful something positive will come out of the current review of planning legislation. A great improvement would be the inclusion of an equal right of appeal on planning application decisions; the public are still disadvantaged in their ability to challenge planning decisions.

Q9. Digital Infrastructure. We agree with your assessment that Aberdeen and Aberdeenshire are falling behind other parts of the country in regard to broadband service and mobile phone coverage. Proposals to improve that through new cabling, masts and connection centres should be supported flexibly by the planning system, taking care not to allow excessive disruption where road works are required e.g. lengthy road closures. Increased flexibility should also not result in over-ruling genuine concerns from nearby residents about radiation energy from telecommunication masts.

Q10. Housing Supply Targets. We agree with the proposal to use a composite scenario rather than any of the three scenarios identified in the Housing Need and Demand Assessment as this appears to better reflect historic trends. We note that the forecast shows an increase of around 5000 homes over the period 2026 to 2035 relative to the current plan.

Q11. Affordable Housing. We agree with the assumption that the Scottish Government will continue funding for affordable housing at 2020/21 levels; given the current shortage it is hard to see how the government can ignore the need and choose to reduce funding.

Q12. Housing Land Requirement. We agree with your Preferred Option to allow 20% generosity in land allowance in the early years, to 2030 and then assume 0% for subsequent years but note the caveat in response to Q13 below. As you note, this can be adjusted nearer the time if demand is strong.

Q13. Housing Land Allowances. We agree with your Preferred Option to include an extra 5500 new homes over the current plan allowances for the period 2016 to 2030, with the caveat that the new homes should be built in the agreed development corridors set out in the Spatial Strategy and not in the A93 and A944 corridors.

Q14. Housing Land Allowance. We agree with your Preferred Option to prioritise brownfield sites and the “currently constrained” sites before making any new land allocations; where new greenfield allocations are made, we support your proposal to limit them to less than 100 units and not allow them to be extensions to existing sites.

Q15. Renewable Energy. We support the Preferred Option that the new plan should target generating 5 Gigawatt hours of renewable electricity and seek to diversify to non-wind based generation and electricity storage by 2040. Minimising the impact on the environment should be a key consideration when reviewing planning applications. More could be done when approving new housing developments where the installation of solar panels and heat pumps could be made a requirement. Also strong consideration should be given to making new housing developments ready for electric cars e.g. by providing a fast charging supply to garages and making it easy to install exterior charge points for properties without garages.

Managing Flood Risk. It is important that the Strategic Plan fully addresses the potential for flooding in areas covered by the plan and that planning policies restrict inappropriate development in flood risk areas.

Q16. Strategic Transport Appraisal. We agree with your statement that the next Strategic Development Plan should continue to identify regionally significant long-term transport projects and cumulative transport interventions, even if it is fairly anodyne. There are several references to the need to reduce private vehicles and increase the attractiveness of other forms of transport; the plan needs to reflect the fact that it embodies a large rural area where frequent public transport is unlikely to be viable, so residents will have no option other than to use private vehicles. As such Aberdeen and surrounding towns must allow for vehicles entering and being able to park.

There is little said about the need for a new Bridge of Dee crossing; we would expect this to be explicitly included as a key item of transport infrastructure for the plan.