

[REDACTED]

From: [REDACTED]
Sent: 22 May 2018 08:50
To: Claire McArthur
Subject: FW: SDPA MIR consultation - Culter Community Council response
Attachments: SDPA MIR Consultation CCC response 20 May 18.pdf

From: Andy Roberts [REDACTED]
Sent: 20 May 2018 14:16
To: [REDACTED]
Subject: SDPA MIR consultation - Culter Community Council response

Team,

I enclose the response to your consultation on the 2018 Main Issues Report for the region's SDP.

Please contact me if you have any questions.

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Andy Roberts Planning Liaison Officer

Strategic Development Plan Review

Main Issues Report Consultation **12th March - 21st May 2018**

The Aberdeen City and Shire Strategic Development Planning Authority are currently reviewing the Strategic Development Plan for the area. Our Development Plan Scheme outlines a timetable for the review of the Plan, and also identifies where there are opportunities to participate. It is available to view at:

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

The **Main Issues Report** is the first formal stage in the review process – it describes and invites discussion on options for future policies, as well as employment and housing land targets for the next Plan. No settled view on the content of the next Strategic Development Plan has yet been reached, making the Main Issues Report the key stage for public consultation. Giving us your views will help to shape the future strategy for development and the policies by which future planning applications are determined.

You can view a copy of the Main Issues Report on our website at:

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

Copies are also available to view at all Council Offices and Libraries within the Strategic Development Plan Area.

A series of accompanying documents, including an Interim Environmental Report, Monitoring Statement, Housing Needs and Demand Assessment and Interim Cumulative Transport Appraisal can also be viewed on our website (by following the above link).

How to Respond

The Main Issues Report contains a series of issues and questions on which we would like to hear your views. Please use this form to respond to these, or any other issues raised by the Main Issues Report or any other accompanying documents.

Consultation Responses must be received by 12pm on Monday 21st May 2018

You can make your views heard in a number of ways:

- **By Post - please return a completed version of this form to:**
Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB
- **By Email - please return a completed version of this form to:**
team@aberdeencityandshire-sdpa.gov.uk
If you choose to fill out our online Word form, please be aware that you must download the form and save any changes before submission.

Letters and emails which do not make use of this form will also be accepted, however please make sure include your name, address, telephone number and email address (if applicable), as well as the details of anyone you are representing, if you would like us to be able to contact you with any queries on your submission.

Using your Personal Information

Information you supply to the Strategic Development Planning Authority (SDPA) by responding to this consultation will be used to prepare the next Strategic Development Plan for the area. The SDPA will not share the personal information provided in response to this consultation with other parties or organisations. The SDPA will not disclose any contact information about you to any organisation or person unless it is authorised or required to do so by law.

The SDPA Officers may use your contact details to contact you about the comments you have made. Your name and organisation may be published alongside your comments but contact details will not be made public. If you chose not to provide a name or contact details, your comments will still be valid but we will not be able to contact you in the future.

For further information on how your information is used, how the SDPA maintain the security of your information, and your rights to access information the SDPA holds about you, please contact: Claire McArthur, Acting Team Leader, Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Contact Details

Name (Mr/Mrs/Miss/Ms)	Mr Andy Roberts Planning Liaison Officer
Organisation (if relevant)	Culter Community Council
Address	
Postcode	
Telephone	
Email	

Please tick this box if you wish further correspondence to be directed to this address:

yes

If you are completing this form on behalf of an organisation, group or landowner, please provide their details below.

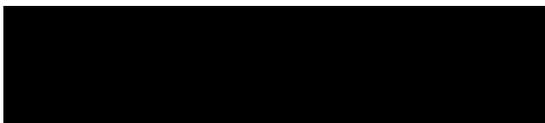
Name (Mr/Mrs/Miss/Ms)	
Organisation (if relevant)	Culter Community Council
Address	
Postcode	
Telephone	
Email	

If you wish to be added to the SDPA distribution list to be kept informed of progress in producing the next SDP, please tick this box and provide the email you wish to be added to our database (if different from above):

yes

our

Email



Your Views

Please use a separate box for each issue/question you wish to respond to. If you wish to continue on a separate sheet, please attach to the paper copy or email.

Main Issue / Question Number:	Q1 Vision
<p>The updated vision set out in the preferred option is acceptable, but 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. The extra clarity on which industries require focus is helpful. It would be powerful to specify who has responsibility for developing the robust and diversified economy, and to commit to engaging with all relevant partners including communities.</p>	

Main Issue / Question Number:	Q2 Spatial Strategy
<p>We agree with the Preferred Option that the existing spatial strategy remains fit for purpose as long as it is clearly stated within that option that growth above currently approved development plans along the A93 and A944 corridors is not supported until both transport and other infrastructure challenges (e.g. schooling, medical services) are better understood and addressed. We would like to see a commitment to ensure development is along corridors with green space maintained between them, and for such development to be kept sufficiently dense to be serviced efficiently by public transport services.</p>	

Main Issue / Question Number:	Q3 Aberdeen Western Peripheral Route
<p>We agree with the Preferred Option to protect the junctions of the Aberdeen Western Peripheral Route from inappropriate speculative development. We suggest that there also be a commitment to preventing the formation of new junctions, for the same reasons. We agree with the proposal to require any major development proposal to be brought forward only through the full and open development-plan process.</p>	

Main Issue / Question Number:	Q4 Regeneration
<p>We support the proposal for Aberdeen City to progress with the City Centre Masterplan. We would like the SDP to include proposals for the several areas of Aberdeen which sit outside the city centre, and which are in need of regeneration to improve the quality of life for their residents. We are not in a position to comment on the priority areas in the Shire.</p>	

Main Issue / Question Number:	Q5 Economic Growth
<p>We believe the Strategic Development Plan should be based on a realistic view of future economic growth, and incorporating flexibility to respond to either faster or slower growth than forecast at this point. Basing plans on optimistic views means the likelihood is that economic conditions do not improve as fast as the forecast, so the plans tend to encourage more development proposals than are needed for the area, and to result in a failure to deliver the plan and hence disappointment.</p> <p>We support the inclusion of new transport infrastructure associated with Aberdeen Harbour expansion in the Strategic Development Plan, and in the Aberdeen Local development Plan.</p>	

Main Issue / Question Number:	Q6 Employment Land
<p>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.</p>	

Main Issue / Question Number:	Q7 Tourist Development
<p>We agree with the Preferred Option that the new plan should take a stronger and more flexible approach to long-term tourist development; it will be important to see what specific measures and approaches are being proposed, and specifically to encourage museums reflecting the features of the North East.</p>	

Main Issue / Question Number:

Q8 Planning System and Economic Growth

Much has been said and submitted to the Scottish Government about how the planning system could be improved. It appears that 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 greatly disadvantaged in their ability to challenge weakly-founded or very-contentious planning decisions.

Main Issue / Question Number:

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 (eg lengthy road closures). Genuine concerns from nearby residents about radiation energy from telecommunication masts need to be addressed explicitly and resolved to the satisfaction of all parties.

Main Issue / Question Number:

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.

Main Issue / Question Number:

Q11 Affordable Housing

We agree with the assumption that the Scottish Government will continue funding for affordable housing at 2020/21 levels. It would be powerful to set out how truly mixed estates and housing developments with good levels of affordable housing will in fact be delivered in the future.

Main Issue / Question Number:

Q12 Housing Land Requirement

We agree with your Preferred Option to allow 20% generosity in land allowance in the earlier years, and then assume 0% for subsequent years. As you note, this can be adjusted nearer the time if demand is strong.

Main Issue / Question Number:

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.

It would be helpful to provide direction that land needs to be allocated with a clear view to the needs of individual communities. If Community A needs say, starter homes, and the nearest land allocated for starter homes is two bus rides and a long walk away, our communities – especially the less-wealthy - will wither.

Main Issue / Question Number:

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, ensure material provision of affordable housing, and not allow these sites to be extensions to existing sites.

Main Issue / Question Number:

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 – although there has to be a question about whether NE Scotland can realistically be efficient enough in generating solar power, compared with southern parts of England, to make it worth allocating the required resources so far north. Minimising the impact on the environment should be a key consideration when reviewing planning applications.

Managing Flood Risk - it is important that the Strategic Development Plan fully addresses the potential for flooding in areas covered by the plan and develops proposals for flood-mitigation infrastructure (recognising that heavier rain-storms are predicted as the climate changes), and that planning policies restrict inappropriate development in flood-risk areas.

Main Issue / Question Number:

Q16 Strategic Transport Appraisal

We agree 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.

Little is 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. Integrated planning for this and for the proposed new access to the Nigg Bay harbour facilities should also be specified.