

Proposed Aberdeen City & Shire Strategic Development Plan Representation Form

Please use this form to make comments on the Proposed Aberdeen City & Shire Strategic Development Plan, ensuring that your comments relate to a specific issue in either the Proposed Plan, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The period for representations will run between Monday 8 October - Monday 17 December 2018

Name	[REDACTED]
Organisation (optional)	
On behalf of (if relevant)	
Address	[REDACTED]
Postcode	
Telephone (optional)	
E-mail (optional)	

What is your preferred method of communication: _____ Email

What document are you commenting on?	Proposed Strategic Development Plan	<input checked="" type="checkbox"/>
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Issue		Paragraph(s)
Certainty for communities.		3.2

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

The promise of “certainty for communities” has already been broken through manipulation of the current SDP and Aberdeen LDP. Unless the SDP and LDPs have to be adjusted to tackle an unforeseen national priority, local communities should expect that these plans will be adhered to, especially when they have been agreed after extensive public consultation. A classic example is the planning permission granted by Aberdeen City Council for the stadium and football training development at Kingsford. Although the vast majority of residents in Westhill and Kingswells who responded to the planning application submitted objections, this majority view was over-ruled by Aberdeen City Council. To many people, this decision was a clear breach of local democracy and will not have inspired confidence and certainty in the delivery of the next SDP and LDPs.

Ensuring public trust in the planning system should be a key working principle.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

3.2 should be adjusted or extended to state that the “certainty” referred to is supported by a commitment that the SDP and LDPs will be adhered to unless there are very extenuating circumstances, typically at the level of national priorities.

Modify Targets as necessary.

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Issue		Paragraph(s)
Delivery of New Homes		4.11, 4.14, 4.15, 4.18 and 4.19

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Sites allocated for housing within the existing SDP are already very generous. Some very large sites like the Newhills Extension have not yet been utilised. Others like Chapelton of Elsick, Maidencraig and Countesswells have, to date, used only a small fraction of the total land already allocated. The 20% "generosity" to 2032 is therefore excessively generous and at odds with the statements made in 4.14, 4.15 and 4.19.

It is unacceptable that new site allocations will be made in the next LDPs when developers themselves can pick and choose whether or not to use pre-existing sites. This is just a recipe for fragmented and uncontrolled development of the Green Belt. No new sites of any size should be allocated until the pre-existing ones have been used up. This does not preclude any small-scale, discrete developments required to meet local housing needs in smaller communities.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

It should be reinforced that the pre-existing allocation of land for housing is already very generous. The 20% "generosity" allowance should be scaled down considerably or removed altogether.

In areas where large allocations of land in the current LDPs are still unused no further allocations should be made except to meet particular local needs.

Modify Targets as necessary.

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Issue		Paragraph(s)	
Developer contributions		3.7	

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Developers' contributions have often been paltry when set against the profits they are making. The sense of injustice is exacerbated when developers demand very protracted road closures on commuter routes. A classic example is the road through the new Countesswells development which inconvenienced thousands of drivers for many months causing them increased fuel costs and loss of time due to lengthy diversions. This benefited no-one apart from the developer who should have been asked to plan well in advance for alternative routes for construction traffic and the routing of services and utilities.

Developer contributions should not be channelled off to meet other Council priorities. They should be focused on the local area.

The experience at Chapelton of Elswick, where a developer managed to avoid a large contribution towards local road improvements, should not be used as a reason for Councils to back-off from demanding fair and proportionate contributions from developers.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

In **3.7**, change the sentence to

“Developers will also have to accept the need for fair and proportionate contributions towards necessary infrastructure,the price paid for land.”

Also add something like

“Developments should be planned to ensure minimum inconvenience to the public during the construction phase.”

Modify Targets as necessary.

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Issue Overall tone and emphasis.		Paragraph(s) 1. Our Plan 2. Our Vision

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Overall, the draft SDP is well constructed and comprehensive and makes many good and positive statements. However, it is described as a “refresh” of the Development Plan 2014 and that’s how it comes across. Although it stresses the need for diversification, there’s not much that’s radically new or visionary when compared to the 2014 version. The period to 2040 will be one of rapid and major technological change, rather than just more of the same with some adjustments. In particular, the increasing impact of climate change and how to respond to it will probably be **the** defining issue of the age.

The oil and gas industry is currently a key part of the area’s economy but this should not be a reason to under-emphasise the importance of new and alternative forms of energy production and transport. (Unfortunately, this under-emphasis is evident in some other sections of the SDP). Within the period to 2040, Scotland has to meet or exceed its obligations under the Paris Agreement on Climate Change, implement low-emission zones in town/city centres, and phase out new petrol and diesel cars and vans by 2032. This alone will necessitate major changes in transport infrastructure. (See later comments)

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Overall, the Plan and Vision cover all the right things. The issue is really one of emphasis.

The importance and coming impact of climate change, and the changes that will be required to address it, needs to be more “up front” in the Vision/Our Plan sections, not relegated to the last bullet of 2.2.

The City and Shire have benefited economically from a vast amount of engineering and technological expertise and innovation. The potential of this expertise to address future changes and challenges, particularly in the areas of sustainable energy production and transport, should be emphasised more strongly.

Modify Targets as necessary.

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	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Issue Placemaking		Paragraph(s) 4.1 to 4.7

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

It is important to quality of life that people have a sense of place; that they can feel their community is “special”, self-contained and sustainable and not just another part of a spreading conurbation. The aim of avoiding coalescence of communities and (mentioned in previous SDPs) appears to be missing. Is this deliberate or just an over-sight ?

In terms of providing a greater mix, size and types of new homes there is one notable shortfall – the provision of suitable homes for the growing number of elderly people, many of whom will live alone or wish to downsize from larger homes more suited to families. New homes for the elderly need to be located within easy distance of services and public transport. They do not require large floor space or large gardens. They should be single-storey homes with easy access to allow for possible disability in old age. Too often, for reasons of profit, developers have been reluctant to include a sufficient number of such homes in new developments. This is unacceptable given the demographic trends.

Developers need to include sufficient affordable homes in new developments across a range of locations to give people choice (ie. not just concentrated in less affluent areas). Too often, developers seem to be able to “wriggle out” out of this, again for reasons of profit. The stated Target of “generally no more than 25%” of affordable homes sounds weak – does that mean just 1% would be acceptable ?

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

The aim to avoid coalescence of communities in order to preserve their sense of place and individual identity should be reinstated and made explicit.

Stronger emphasis should be given to providing suitable homes for the elderly within new developments. Developers should be required to include a suitable number in their planning applications. This should be just as important as the number of affordable homes to be included. It will be up to Councils to decide if the number included is appropriate.

To promote choice and social mobility, the Target in the SDP for affordable homes should state a *minimum* quota (say 10% for all new developments of 50 or more homes). Based on local need, Councils should set the minimum figure when approving an application.

Modify Targets as necessary.

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Issue	Paragraph(s)	
Quality of the Environment	6.3 to 6.5	
	6.8, 6.11, 6.12	

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

As part of the drainage system for the AWPR, SUDs ponds have been created that will benefit wildlife and biodiversity. Some new developments such as Countesswells and Prime Four have created a variety of drainage features with similar benefits. Others have only incorporated dry detention basins that are sterile grassy hollows without any wildlife value.

Some locally designated areas for wildlife are at risk from encroaching developments. They should be respected by landowners and given sufficient protection.

The development of core paths has been of real benefit in enabling access to green networks and promoting health and wellbeing. A continuous coastal path along the City and Shire coastline would also be good for tourism.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

To help to promote biodiversity, new developments should try to incorporate retention ponds and other permanent water features into their SUDs schemes.

Where developments encroach on designated wildlife sites, appropriate “green buffer zones” should be included in plans in order to protect and enhance them. Where appropriate, developer contributions should be requested by Councils to help conserve and improve the sites.

The Councils should aim to create a continuous coastal path around the region.

Modify Targets as necessary.

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Issue		Paragraph(s)
Sustainable Development and Climate Change		6.14

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Domestic heating and transport are major contributors to climate change.

There are already some very good examples of solar panels being fitted to schools, care homes and social housing.

However, most developers have limited their energy conservation measures to the “fabric first” approach. This basic requirement is simply not enough help tackle climate change over the next 20 years. Developers should aim to incorporate solar panels into all new properties whose orientations allow the panels to work efficiently. Many buyers are likely to agree to this requirement given the savings they can make on energy bills. Some may prefer to fit solar panels on garage roofs or other structures on-site.

The infrastructure needed to cope with the move to hybrid, electric or hydrogen-powered vehicles is completely insufficient at present and will need rapid development.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

The statements made in **6.14** are good. However, “Developments should examine the potential for.....” sounds quite weak. A new sentence should be included for greater emphasis:
“Developers should ensure the incorporation of low and zero carbon generating technologies, including solar panels, wherever appropriate.”

Developers should be prepared to fit all new properties (domestic, commercial and public) with sufficient external charging points after consultation with the owners. A major programme of works will be needed to retro-fit older properties and provide suitable charging points on streets and car parks.

Modify Targets as necessary.

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Issue Tourism		Paragraph(s) 5.5

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

Windfarms are contributing effectively to the decarbonisation of energy production. Some have been located appropriately in areas of low scenic value, and the growing preference for offshore sites is welcome. However, there is real potential conflict between promoting an area for tourism while at the same time granting planning permission for windfarms that damage landscapes and biodiversity and destroy a sense of place. A current example is the proposed windfarm at Glendye south of Banchory. Even some of the offshore windfarms being developed may have unforeseen impacts on seabird populations and consequently nature tourism along our coastlines.

A continuous coastal path along the City and Shire coastline would be good for tourism.

What change would you like to see made?

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The potential for conflict between tourism and the development of windfarms is important should be made more explicit. Sites that damage landscape vistas and biodiversity should be strictly avoided. The likely environmental impacts of both onshore and offshore sites should be carefully researched prior to approval.

Modify Targets as necessary.

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Issue		Paragraph(s)
Transport		7.3 and Targets

What would you like to say about the issue?

(if you would like to write more than the box allows then please attach this form to any additional papers)

By introducing hydrogen-powered buses Aberdeen has made a good start towards more sustainable forms of transport. However, given the technical and engineering expertise in the region, there is much potential to examine other ways of reducing emissions such as electrically-powered trams or a monorail system. Broad minds and imagination will be required to reduce the contribution that transport makes to climate change in the next 20 years.

Given the importance of building a refuelling network for hybrid, electric and hydrogen-powered vehicles, it is surprising that this is not included in the Targets.

What change would you like to see made?

(if you would like to write more than the box allows then please attach this form to any additional papers)

The Targets should include the need to build an extensive refuelling network for electric and hydrogen-powered vehicles.

Modify Targets as necessary.