



Aberdeen City and Shire Strategic Planning Committee: 25 June 2007

Issues Report – Results of the consultation

1 Purpose of report

- 1.1 To inform Members on the outcomes of the public consultation on the Structure Plan 'Issues Report'.

2 Background

- 2.1 At a special meeting of Aberdeen City and Shire Strategic Planning Committee held on 12 January 2007 it was agreed to publish and consult on an 'Issues Report' as part of the engagement on the preparation of a new structure plan. This document was published on the 23 February 2007.
- 2.2 The 'Issues Report' sought views on three specific areas:
- a draft vision - seeking comment on its content;
 - the issues the structure plan should address – the report presented 13 issues, derived through stakeholder and community engagement and sought views on the relative importance of these, any omissions and how they could be addressed; and
 - the spatial strategy the plan should follow – seeking views on where development should be located.
- 2.3 The consultation period closed on 6 April 2007.

3 Proposals

- 3.1 Members are asked to consider the enclosed appendices (one on the consultation process and one on each of the areas identified in para 2.2 above) and note the conclusions that have been drawn by officers.
- 3.2 Copies of this report, the appendices and responses to individual comments will be placed on the plan website and respondents will be notified accordingly.
- 3.3 It is proposed that the responses received to the issues report consultation should inform the preparation of the draft structure plan. In particular, comments received will inform the preparation of a revised draft vision (see separate report on the agenda), and those topics on which the structure plan should seek to concentrate. These are housing, employment, and the impacts that these have on transportation.

4 Discussion

- 4.1 Details of the method by which views were sought on the Issues Report are contained in Appendix 1. A total of 91 consultation responses were received and despite this relatively low volume, the quality of responses was generally high. The consultation has been considered a success in achieving its desired outcomes of raising awareness and identifying priorities. On analysis 1004 individual comments were identified from these responses.

- 4.2 A schedule of comments has been developed, and each comment considered. A response for each comment has been identified (even if that response is only that it has been “noted”). This schedule has been placed in the Members libraries’ and will be placed on the internet at www.acssp.net following the Committee.
- 4.3 Analysis and commentary on each of the three areas noted above have been developed and are attached as Appendix 2 (Comments on the Draft Vision), Appendix 3 (Comments on the Issues) and Appendix 4 (Comments on the Locations of development) respectively.

Comments on the draft vision

- 4.4 While there was a degree of support for the draft vision statement, 63% of all comments received on this topic suggested that improvements could be made. Lack of emphasis on the economic growth of the region was most frequently identified. There was also a significant body of opinion that suggested that the vision should give greater emphasis to ensuring that future development occurs in a sustainable manner. A number of suggestions for alternative wording of the vision statement were made.

Comments on the issues

- 4.5 There was a high degree of consensus that the issues identified were of relevance to the structure plan but some saw the lack of an explicit mention of rural development as an omission. The greatest numbers of comments were received on the housing and economic potential topics and a significant proportion of respondees identified the need to plan for growth and anticipate / plan for future change over the life of the plan in many of the issues identified. The importance of integrating land use with transport was a significant theme.

Locations for development

- 4.6 Responses to the issues report identified growth in the City region as a clear aspiration. While a significant proportion of respondees identified the importance of Aberdeen City as a focus for development, there was also recognition of the need to provide wide opportunity. No clear consensus on the spatial strategy that should be adopted for the plan emerged through this exercise, although there is a strong element of support for development in the existing Inverurie – Stonehaven rail / road corridor and in edge of city settlements, in addition to Aberdeen City locations. New settlements were also a prominent feature of the responses received.

5 Recommendation

- 5.1 It is recommended that the Committee note the conclusions drawn from analysis of comments received in response to the Issues Report and instruct officers to take these conclusions (and the responses themselves) into account when drawing up the draft plan.



Dr Margaret Bochel
Head of Planning and Infrastructure
Aberdeen City Council



Dr Christine Gore
Director of Planning & Environmental Services
Aberdeenshire Council

28 May 2007

|

APPENDIX 1: Consultation on the Issues Report

1 Introduction

- 1.1 This report provides a summary of the consultation process associated with the formal start to the preparation of a new structure plan for Aberdeen and Aberdeenshire. It outlines the nature of the documents published, the publicity given, and a broad indication of the nature of the response. In addition, the report evaluates the extent to which the consultation process can be considered a success.

2 Background

- 2.1 The Aberdeen City and Shire Strategic Planning Committee agreed, on 12 January 2007, to commence the preparation of a new structure plan. They further agreed to publish a Development Plan Scheme, a Report of Survey, a 'Getting Involved' leaflet as well as consult on an Issues Report. Radio Scotland's local news bulletin reported this decision.
- 2.2 The Issues Report had been developed through a series of consultations with Members, key stakeholders, community groups and Community Councils during 2006. Observations had been sought on what they thought were the main strategic planning issues affecting the region. Over 600 views were identified, and these were analysed and developed into the 13 strategic issues presented in the Issues Report.
- 2.3 All four published documents were reviewed by the Plain English Campaign and three of them (Development Plan Scheme, 'Getting Involved' leaflet and the Issues Report) received a 'Crystal Mark'.
- 2.4 Of the four documents, only the Issues Report explicitly sought a response, with a closing date of 6 April. The Issues Report was structured around three questions relating to the vision, issues and strategy for the new plan.

3 Publicity

- 3.1 In order to secure adequate publicity for the formal start to the structure plan process and consultation on the Issues Report, the following steps were taken:
- A formal 'notice' was published in the Press and Journal (on 23 February 2007 and 2 March 2007 – see Appendix 1) and the Edinburgh Gazette (23 February 2007 – see Appendix 2) in the form prescribed by regulation.
 - A more informative 'advert' was published in a range of local newspapers (between 23 February and 2 March 2007 – see Appendix 3). This advert had a Plain English Campaign 'Crystal Mark', although space did not allow the logo to be displayed.
 - A press release was issued on 22 February 2007 and sent to over 40 press organisations as well as being placed on the websites of the two councils (see Appendix 4).
 - The documents were published on a dedicated website (www.acssp.net). In the period 23 February 2007 to 6 April 2007 the website received more than 400 'hits'.

- Copies of all four documents were distributed to (and available for public viewing / uplift from) both Council HQ planning receptions (2 locations), area planning offices in Aberdeenshire (6 locations), public libraries (54 locations) and information points (3 locations).
 - 838 individual letters with complementary copies of the Development Plan Scheme and Issues Report were posted out to individuals and organisations¹, including community councils, community centres, focus group members, neighbouring local authorities², statutory consultees and other stakeholders.
 - Letters with a copy of the “Getting Involved” leaflet were sent to an additional 422 individuals or businesses with a known interest in strategic planning (largely taken from the database used for the preparation of the previous structure plan), indicating the start of the structure plan process and how the consultation documents could be obtained.
 - Copies of the documents were sent to anyone on request.
- 3.2 A news article was published in The Press and Journal on 4 April 2007 inviting comments on the issues report before the consultation period closed on 6 April (Appendix 5).

4 The response to the consultation exercise

- 4.1 There are three fundamental components to the consideration of the response to the consultation exercise:
- the number and format of responses;
 - the source of responses; and
 - the content of responses.
- 4.2 These are each addressed below. Beyond the general consideration of the content of the responses possible as part of this report, other reports analyse this in significantly more detail.
- Number and format of responses
- 4.3 The publication of the Issues Report resulted in 91 written responses. On analysis, all were judged to be of relevance to the structure plan. The majority of these were received within the prescribed consultation period, but 14 late submissions were accepted.
- 4.4 A number of respondents sent copies of their response to both councils, sent email as well as hard copy responses or sent duplicate responses. As a result, 1004 distinct comments were received.
- 4.5 In terms of format, the consultation documents highlighted three ways to make a response - by post, by fax and by email.
- 4.6 The number and proportion of responses received by each method is highlighted in Table 1 below.

¹ Listed under Development Plan Scheme (DPS Appendices 3 to 7)

² Perth and Kinross Council, Highland Council, Angus Council, Dundee City Council, Moray Council, and the Cairngorms National Park Authority

Table 1: Format of responses to the consultation

	Number	Percentage
Post	60	66%
Fax	2	2%
Email	29	32%
Total	91	100%

- 4.7 All written representations were acknowledged in writing upon receipt and details entered into a database for analysis. A commitment was given to supply individuals with a copy of the summary report. A schedule of summarised comments and the Council's commentary has been placed on the structure plan's website (www.acssp.net).

Source of responses

- 4.8 Of the 91 representations received, a significant proportion were from property interests and developers (see Table 2). Individual members of the public comprised the second largest grouping. Six responses were received from Community Councils, representing 6% of all the Community Councils within the structure plan area.

Table 2: Sources of representation on the structure plan documents

	Number	Percentage
General public	17	19%
Property/land interests*	38	42%
Elected members	1	1%
Community Councils	6	7%
Interest groups	7	8%
Business	5	6%
Government agencies	9	10%
Other local authorities	0	0%
Council departments	2	2%
Other	6	7%
TOTAL	91	100%

* Most responses prepared by agents on behalf of companies with property/land interests

Content of responses

- 4.9 1004 individual comments were identified in the submitted responses. The greatest numbers of comments received were in relation to Question 2 – the issues the plan should address. Question 2 raised 13 different issues (listed as (a) to (m) in Table 3 below), and the greatest number of comments was in relation to housing. The spatial strategy (Question 3) received 200 comments and the draft vision (Question

1) received 88. In addition, a number of other comments were made of a more general nature.

Table 3: Written representations by Issue Report section

Question	Issue	Number of responses
1	Draft vision	88
2 (a)	Population	38
2 (b)	Changes in the population	35
2 (c)	Regeneration	32
2 (d)	Balancing need	32
2 (e)	Green Belt	37
2 (f)	Housing	121
2 (g)	Design	41
2 (h)	Shopping	31
2 (i)	Economic potential	73
2 (j)	Transport	84
2 (k)	Infrastructure	44
2 (l)	Climate change	46
2 (m)	Heritage	31
3	Spatial strategy	200
	<i>Other key issues</i>	13
	<i>General comments</i>	39
	<i>None of the above</i>	4

5 Evaluation of the consultation process

- 5.1 The press release, newspaper articles, adverts, and the posting out of 1250 letters attracted only 91 responses, and these were principally from property developers.
- 5.2 The low number of responses on the Issue Report could be attributed to the lack of awareness of the general public that a new structure plan is being prepared. This was confirmed at subsequent public engagement meetings held after the consultation period closed, where attendees were asked if they had read any articles or adverts in their local newspapers on the preparation of the new structure plan. Very few of the attendees (most of whom had received direct invitations to these meetings) reported that they had seen anything about the structure plan in their local newspaper. Had more of these meetings taken place during the Issues Paper consultation period they may have encouraged further responses.
- 5.3 Only 6 Community Councils made submissions on the Issues Report. Two Community Councils expressed the view that a 6-week consultation period was insufficient to give this matter full consideration. This is not seen to invalidate the

consultation as meetings had been held with Community Council Forums previously to scope the issues. Community Councils attending these Forums were asked for their views on the main issues affecting the region and the Issues Report is thus a reflection of their views.

- 5.4 Some responses received related to local or site-specific concerns, or bids for land to be considered in the development plan. This is to be expected. However, it was highlighted in the Issues Report that the structure plan is limited in what it can do, as it cannot address all the issues, such as the disrepair of pavements or dwellings. Where it was possible, officers sought to identify the strategic issues that underlay the comment made.
- 5.5 It was suggested at one of the community engagement meetings that more could have been done to publicise the consultation exercise in local media. However, adverts had been placed in 15 newspapers throughout the area to try to cover this need.
- 5.6 Planning Advice Note 81: Community Engagement (PAN81) was published in March 2007 (during the consultation period on the Issues Report). This suggests a number of possible ways for engaging with members of the public, including the preparation of a media strategy. A draft Media Strategy was prepared, but it could not be agreed and implemented in the necessary timeframe.
- 5.7 The website has, however, been well used with over 400 "hits". This number is significantly higher than the number of responses received on the Issues Report. This is most likely due to the fact that all correspondence listed the website's address and demonstrates the importance of this media in communication and consultation.
- 5.8 Nonetheless, the Issues Report has been an effective vehicle for early engagement with members of the public and other stakeholders in the preparation of the structure plan, as supported by the Planning etc (Scotland) Act 2006 and encouraged in PAN 81. This early engagement in the plan making process has confirmed views on the current strategic issues affecting the northeast, and has provided valuable feedback into the process from a good cross-section of participants. It has also identified issues omitted in the Issues Report that could be considered when preparing the draft structure plan. Despite the relatively low response rate, the consultation can still be judged to have been a success. The 1004 individual comments received have informed officers of the diversity and strength of view from a cross section of stakeholders.
- 5.9 PAN81 will be considered in more detail and the lessons will be learnt from this exercise prior to the next consultation exercise on the draft plan in early 2008.

Appendix 1 – Notice of Intent to prepare a Structure Plan placed in The Press and Journal (23 February and 2 March 2007)



**NOTICE OF INTENTION TO START
PREPARATION OF STRUCTURE PLAN**

Town and Country Planning (Scotland) Act 1972
Town and Country Planning (Scotland) Act 1997

Aberdeen City and Aberdeenshire
(excluding the Cairngorms National Park Area) Structure Plan

Aberdeen City Council and Aberdeenshire Council intend to prepare the above named structure plan in respect of land in Aberdeen City and Aberdeenshire.

Further information on the plan can be obtained from the Structure Plan Joint Officer Group at either Strategic Leadership, Planning and Infrastructure, Aberdeen City Council, St Nicholas House, Broad Street, Aberdeen (tel 01224 523325), or Planning Policy and Environment, Aberdeenshire Council, Woodhill House, Aberdeen (tel 01224 664755)

Dr Margaret Bochel
Head of Planning and
Infrastructure
Aberdeen City Council

Dr Christine Gore
Director of Planning and
Environmental Services
Aberdeenshire Council

23 February 2007

Appendix 2: Notice of Intent to prepare a Structure Plan placed in the Edinburgh Gazette 23 February 2007 page 632

Publication Date: *Friday, 23 February 2007*

Notice Code: **1601**

Town & Country Planning

Aberdeen City Council and Aberdeenshire Council

NOTICE OF INTENTION TO START PREPARATION OF STRUCTURE PLAN

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1972

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997

ABERDEEN CITY AND ABERDEENSHIRE (EXCLUDING THE CAIRNGORMS NATIONAL PARK AREA) STRUCTURE PLAN

Aberdeen City Council and Aberdeenshire Council intend to prepare the above named structure plan in respect of land in Aberdeen City and Aberdeenshire.

Further information on the plan can be obtained from the Structure Plan Joint Officer Group at either Strategic Leadership, Planning and Infrastructure, Aberdeen City Council, St Nicholas House, Broad Street, Aberdeen (tel 01224 523325), or Planning Policy and Environment, Aberdeenshire Council, Woodhill House, Aberdeen (tel 01224 664755)

23 February 2007.

Dr Margaret Bochel

Head of Planning and Infrastructure, Aberdeen City Council

Dr Christine Gore

Director of Planning and Environmental Services, Aberdeenshire Council

(1601/288)

Appendix 3: Advert placed in the local newspapers papers between 23 February and 2 March 2007

An information advert (below) was placed in the following local papers:

- Press & Journal – 23 February 2007
- Buchan Observer – 27 February 2007
- Banffshire Journal – 28 February 2007
- Aberdeen & District Independent – 1 March 2007
- Ellon Times – 1 March 2007
- Montrose Review – 1 March 2007
- Inverurie Herald – 2 March 2007
- Deeside Piper – 2 March 2007
- Donside Piper – 2 March 2007
- Kincardineshire Observer – 2 March 2007
- The Ellon Advertiser – 2 March 2007
- The Huntly Express – 2 March 2007
- The Inverurie Advertiser – 2 March 2007
- The Mearns Leader – 2 March 2007
- The Turriff Advertiser – 2 March 2007

THE ABERDEEN CITY AND SHIRE STRUCTURE PLAN

“NORTH-EAST PEOPLE HAVE THE CHANCE TO SHAPE THE FUTURE OF THE REGION”

We (Aberdeen City Council and Aberdeenshire Council) have started to prepare a new structure plan. The plan will cover the area of both councils, but not the part of Aberdeenshire within the Cairngorms National Park.

The structure plan is a strategy for using land in the future. It covers the next 25 years and focuses on issues such as:

- the amount of new development needed;
- what sort of developments we need; and
- where new developments should be built.

The plan looks at developing areas for things such as housing, offices and shops. It does not contain detailed policies but sets broad aims.

The structure plan is an important document that will guide how the area is developed in the future. Local plans are based on structure plans, and individual planning applications are also influenced by the content of the structure plan.

We have published the following four documents.

- 1 **Development plan scheme** – a document which sets out the timetable for preparing the plan and the opportunities for you to get involved and influence the plan.
- 2 **Getting involved** – a leaflet which explains how you can get involved in developing the structure plan.
- 3 **Issues report** – a consultation document that sets out a draft vision and 13 issues which the structure plan could aim to deal with. We need your responses to the issues report by 6 April 2007.
- 4 **Report of survey** – a document which sets out background information on the economy, environment, transport and housing in the area, as well as wider issues such as the population changing and the size of towns and villages in the area.

You can get more information about the structure plan (including these four documents) from:

- the plan website (www.acssp.net);
- all libraries in Aberdeen and Aberdeenshire;
- area offices in Aberdeenshire;
- 'The Point' (an information centre on Broad Street, Aberdeen);
- and
- the Structure Plan Joint Officer Group at either of the addresses below.

Aberdeen City Council	Aberdeenshire Council
Planning and Infrastructure	Planning Policy and Environment
St Nicholas House	Woodhill House
Broad Street	Westburn Road
Aberdeen	Aberdeen
AB10 1BW	AB16 5GB
Phone: 01224 523325	Phone: 01224 664755

Appendix 4: Press release issued by the two Councils 23 February 2007

Public urged to help plan the North-east's future

The people of the North-east are being urged to help shape the way the region grows over the next two decades and beyond.

Aberdeen City and Aberdeenshire Councils are poised to prepare a new Structure Plan for the area, in close consultation with local people and scores of North-east organisations.

The important document will identify the development which is needed in the next 25 years, what form it should take and where it should be focused – and it will stress that growth should be managed with as little harm as possible to the wider environment.

The plan will also aim to ensure the North-east has a large enough population, and sufficient homes and jobs, to sustain the quality of services and facilities which people have a right to expect.

Aberdeen city councillor Ian Yuill, joint chair of the Aberdeen City and Shire Strategic Planning Committee, said: “The planning system affects all our lives so now is the time to make your voice heard about the future of your community and environment.”

Fellow joint chair Councillor Alison McInnes, of Aberdeenshire Council, said: “Our planners have already worked with community groups and other stakeholders to map out a draft vision for the area and a series of issues which the North-east faces. Individuals and communities now have the chance to speak up on how our new Structure Plan should be shaped.”

Public consultations are being launched today [Fri, Feb 23] and will run until April 6. Documents are available from all public libraries, on the internet at www.acssp.net, and at area offices in Aberdeenshire and The Point information centre on Broad Street, Aberdeen.

The new plan will cover all of Aberdeen and Aberdeenshire, excluding the Cairngorms National Park, and will look at issues like housing, office developments, new shops, transport and the environment.

The Structure Plan will not pinpoint precisely where new development should take place, which is the purpose of the City's and the Shire's separate Local Plans – but it will spell out broader proposals on how much development should take place and where it should happen.

City and Shire planning officials have set the scene by publishing four preliminary documents:

- a Development Plan Scheme, setting out the timetable for preparing the new Structure Plan and the opportunities for people to influence it;
- a Getting Involved leaflet, which explains how to participate in its preparation;
- an Issues Report, laying out the draft vision and 13 issues which the Structure Plan should tackle;

- a Report of Survey, which presents background information on the North-east economy, environment, transport and housing, and covers wider issues like the changing population and the size of towns and villages.

The draft vision states that by 2030, Aberdeen City and Shire should be an “exciting, modern and environmentally sustainable European city-region” where everyone should have the chance to “enjoy the highest quality of life”.

It also says the North-east should by then be recognised world-wide for its leadership in renewable energy, its technological and intellectual expertise, and its unique natural environment.

Planning officers have drawn up an ambitious programme to deliver a draft plan by January 2008. Public comments on the Issues Report will be fed into the draft. Planners will also write to all respondents to tell them the results of the public feedback and inform them when the follow-up consultations on the draft Structure Plan will start.

The finalised plan should be completed by June 2008 and will then go off to Scottish Ministers for approval within 40 weeks of its submission.

Every stage of the process will involve consultations with local people and organisations.

The Issues Report covers the following topics –

- maintaining a population large enough to allow services to be improved;
- managing the growing number of elderly people, the decline in the number of children and working-age adults, and the increase in workers from abroad;
- regenerating disadvantaged areas;
- balancing the development needs of the city against those of surrounding towns and villages;
- ensuring the Green Belt meets our needs;
- delivering housing of the right size, type and affordability;
- strengthening existing shopping areas;
- encouraging top-quality design and energy efficiency in new developments;
- maximising the North-east’s economic potential through diversification and business development;
- reducing the need to travel;
- ensuring services and infrastructure meet people’s needs;
- tackling the causes and effects of climate change;
- protecting our heritage in terms of culture, buildings and the environment.

Responses to the Issues Report can be sent to Aberdeen City Council, Planning and Infrastructure, St Nicholas House, Broad Street, Aberdeen, AB10 1BW, tel (0124) 523325, or to Aberdeenshire Council, Planning Policy and Environment, Woodhill House, Westburn Road, Aberdeen, AB16 5GB, tel (01224) 664221.

Appendix 5: Article published in The Press and Journal (4 April 2007) (article taken from the website: www.thisisnorthscotland.co.uk)

HAVE YOUR SAY ON FUTURE

People in the North-east have until the end of this week to have their say on the future of the region.

Aberdeenshire and Aberdeen City Councils are preparing a new Structure Plan for the area, in close consultation with local people and many local organisations.

The important document will identify development which is needed in the next 25 years, what form it should take and where it should be focused.

Views are being sought on a variety of issues affecting everyone in the region.

Consultation documents are available from public libraries, online at www.acssp.net, at area offices in Aberdeenshire and at The Point information centre on Broad Street, Aberdeen.

APPENDIX 2: Comments on the draft vision

1 Introduction

1.1 This report provides a summary of the responses to the first question of the Issues Report, regarding the draft vision (referred to as 'the vision' in this report) for the Aberdeen City and Shire Structure Plan.

1.2 The draft vision included in the Issues Report is repeated below:

DRAFT VISION

"By 2030, Aberdeen City and Shire will be an exciting, modern and environmentally sustainable European city region. Our communities will include everybody and enjoy the highest quality of life. We will be recognised across the world for our leadership in renewable energy, our technological and intellectual excellence, and the unique qualities of our environment.

To help achieve the vision, this plan will encourage new development to use land in a way that has less and less of an effect on the wider environment. It will help all the industries that support the vision to be successful. It will allow the area to have enough people, homes and jobs to support the level of services and facilities the community wants, and will provide a range of opportunities in lifestyle.

In achieving our vision, we will:

- manage our natural, built and community resources responsibly;
- consider the needs of all our different communities fairly, now and in the future; and
- be confident and courageous when making the hard choices needed to allow change to happen."

1.3 Three questions were asked in relation to Question 1: What should the plan's vision be? These were:

- Do you support our draft vision?
- Does it strike the right balance between change and protection and between economic growth, the environment and having a society that includes everybody?
- Can you suggest any improvements?

2 Overview

2.1 A total of 88 comments (out of 1004) were recorded as relating to the draft vision. Of these comments:

- 17 expressed support for the vision as written, or for the themes covered by the vision (the economy, the environment and the need to consider all of the region's communities).

- 33 have been identified as proposing alternative versions for sections of the vision, or else a re-wording of the text to highlight favoured themes.
- 12 responses were seen as suggesting that the vision should be more ambitious.

Overall, a variety of diverse comments were recorded as concerning Question 1.

3 Responses

- 3.1 Table 1 below categorises the comments received on the draft vision. Each of these are considered in more detail in the sections below.

Table 1: Written Representations on the Vision

Sub-category of Response	Number of comments	As percentage of all comments received on the Issues Report
General Comment	57	6%
First Paragraph	12	1%
Second Paragraph	7	1%
Last Paragraph	12	1%
Total	88	9%

4 Analysis

General Comment

- 4.1 Many of the comments on the draft vision suggest that changes need to be made to the text to reflect a sense of priority between the various themes. The change most commonly proposed relates to the issue of economic development; it was suggested that the vision does not put enough emphasis on this very important issue:

“Sustainable economic development is the priority issue to be addressed in the vision and this needs to be much more explicit than outlined in the issues paper.”

- 4.2 In addition, a significant number of responses stated a need to provide an explicit and ambitious statement for economic growth; some noted that such a statement should relate to high-level economic development strategies, such as the forthcoming ACSEF vision:

“The vision should not be about maintaining what we have, but encouraging growth and expansion.”

“the broad vision and objectives of the structure plan should be consistent with “Smart, Successful Scotland” and the ACSEF strategy.”

- 4.3 A number of responses however expressed support for the draft vision. Support was given for the vision as a whole and also for particular sentiments, such as the need to include everyone:

“The vision is aspirational and also all-encompassing/covers all the bases.”

- 4.4 Some of the responses suggested the issue of how planning decisions will be made should be addressed by the vision:

“The vision should state that we need to be careful and considered in our approach and mindful in our stewardship of the land.”

- 4.5 One response made clear that the text should mention a need to empower local communities in decision-making processes; another suggested that an order of priorities (e.g. the economy, the environment, communities) should be suggested by the vision statement, to guide planning decisions.
- 4.6 One response explicitly highlighted the length of the vision and the need for a considerably shorter statement.

First Paragraph

- 4.7 A number of the comments related to the sentences of the first paragraph, or to the written style of this part of the vision. Although a wide variety of views were expressed, several suggested that the language used is inappropriate:

“The language used in the first paragraph is so overblown that it will lead to derision”

It should be noted that all but one of the comments on the style of language used were provided by the same planning consultancy, acting on behalf of different clients.

- 4.8 Of the remaining comments on the first paragraph, two suggested that there has been deterioration in the quality of life for residents of the region and two suggested that the first paragraph would not inspire the reader:

“The vision should be more inspiring and could read...In 30 years time, the plan envisages that the region’s economy will have seen sustainable growth at a rate above the national average, and will be encouraged to grow at a rate of at least 2% above that of the UK.”

Second Paragraph

- 4.9 Of the seven comments included in this category, two focused on the idea that the plan should address the wants of communities whilst another two provided views on the issue of “critical mass”, as outlined in the final sentence of the second paragraph. In relation to this sentence, the Councils were reminded of the need to engage with service providers and to recall that the provisions of the plan will not directly affect the population size:

“It cannot be a foregone conclusion that if sufficient development land is made available, it will then follow that the necessary critical mass of population needed to sustain the desired facilities will be established. This is because the population is in decline and not growing.”

- 4.10 One of the comments suggested that a focus on renewable energy was too restrictive.

Last Paragraph

- 4.11 Two of the responses criticised the three bullet points of the last paragraph, whilst several others suggested amendments to it:

“The bullet points in the vision virtually paraphrase the vision statement in the approved structure plan. The structure plan needs to achieve more than its predecessors.”

“A fourth Bullet should be added to achieve the vision: ‘re-localise the economy so that communities become increasingly self-sufficient in their daily needs.’”

- 4.12 However, the final bullet point was supported by comments made in several of the received responses:

“We support the view that hard choices need to be made, to allow positive change.”

5. Summary

- 5.1 The questions stated in paragraph 1.3 provide an appropriate framework for the summary of responses to the draft vision.

Do you support our draft vision?

- A significant number of comments support the vision (17 comments; 30% of the total number of comments in this category).
- A large number of comments are overtly critical of the draft vision 36 comments; 63% of the total number of comments in this category).
- A variety of criticisms of the draft vision were made, in particular relating to: its focus on certain issues; the lack of specific guidance for planning decisions; the unrealistic or overblown nature of the language used.

Does it strike the right balance between change and protection and between economic growth, the environment and having a society that includes everybody?

- Of the various problems suggested regarding the themes of the draft vision, a lack of emphasis on the economic growth of the region was stated most frequently (11 comments; 19% of the total number of comments in this category).
- Many responses also highlighted a need to ensure that future development occurs in a sustainable manner (12 comments; 21% of the total number of comments in this category). Of these, four responses suggested that the vision does not effectively highlight the importance of the environment (4 comments; 7% of the total number of comments in this category).

Can you suggest any improvements?

- A significant number of the comments include suggestions as to how the vision could be improved (24 comments; 42% of the total number of comments in this category).
- Alternative wordings for parts of the vision are provided in some responses (9 comments; 16% of the total number of comments in this category).
- Suggestions on how the vision could be improved are varied; they include: emphasising the need to engage with communities; providing specific targets for economic growth; altering the language used, to provide a more realistic target for development and changing the bullet points of the final paragraph.

APPENDIX 3: Comments on the issues

1 Introduction

- 1.1 This report gives consideration to the comments received on the individual issues identified in the Issues Report. These comments were made in response to a specific question:

Question 2

Are any of the 13 issues (a to m) particularly important? Are any unimportant? Have any key issues been missed? Do you have any views as to how we should tackle these issues, either on our own or with other organisations?

2 Overview

- 2.1 In general a good response was received on this topic, with positive and constructive comments being made. Two thirds of all comments made were made on the individual issues.

3 Responses

- 3.1 The following table details the number of comments received for each of the issues a to m:

Table 1: Written responses to individual issues

	Issue	Number of comments	As percentage of all comments
a	Population	38	4%
b	Changes in the population	35	4%
c	Regeneration	32	3%
d	Balancing need	32	3%
e	Green Belt	37	4%
f	Housing	121	12%
g	Design	41	4%
h	Shopping	31	3%
i	Economic potential	73	7%
j	Transport	84	8%
k	Infrastructure	44	4%
l	Climate Change	46	4%
m	Heritage	31	3%
	Other key issues	13	3%
	Total	658	66%

- 3.2 The most comments were received on issues relating to housing, economic potential and transportation, re-emphasising these as key land use interests by stakeholders for the next structure plan. All other issues received roughly the same number of comments, attracting between 31 and 46 comments.

4 Analysis

Population

- 4.1 Key elements raised in the consultation included a requirement for population growth to meet needs, but there are challenges in terms of achieving a balance between the needs of the City and other areas:

“The plan needs to take positive steps to attract workers to live in the area... More people should be encouraged to live in the City given the loss of families to the Shire”.

“ We should try and attract people into the area, not just maintain the population.”

- 4.2 This was not a universal view however, with two respondents promoting managed decline of the area:

“Resources should be balanced towards stability, ensuring a balanced demographic profile to manage this or allow for gradual decline”

- 4.3 The needs of rural areas were also highlighted:

“The growing of population in rural areas should be encouraged through the provision of employment and housing land to sustain and increase the small rural communities”

Changes in the population

- 4.4 The comments made in relation to this issue largely concentrated on the issues of an increasingly elderly population, and the need to increase the number of economically active people in the area, and the opportunities provided by in-migrants to the area.

- 4.5 Key to responding to the needs of an ageing population was seen to be a change in the nature of development to provide appropriate and adaptable accommodation:

“Appropriate housing needs to be provided for different elements of the population and there should be variety in location and house type.”

“Changes in population structure require adaptable housing provision”

- 4.6 A number of respondents made the point that overall growth was required to cope with the economic changes associated with an ageing population:

“The existing population is rapidly ageing and we are becoming reliant on a smaller and smaller workforce. Is it time to be very pro-active in enticing young dynamic people into our region?”

- 4.7 In-migrants to the area were generally welcomed and the need to accommodate the additional demand that they create was highlighted.

“There will be continued growth in housing demand from new households and in-migration”

Regeneration

- 4.8 A diverse range of views were expressed on this issue and consequently difficulty was encountered in summarising these.
- 4.9 A number of respondents highlighted that regeneration is an important issue and can help improve the quality of life for people:
- “Regeneration provides an opportunity to improve upon communities and individual needs.”*
- “Priority should be given to improving the area people live in and to reduce inequality.”*
- “Regeneration can make a positive contribution and create a community focus and has the potential to provide affordable housing in locations to a larger cross section of the population.”*
- 4.10 A number of respondents commented on areas where regeneration should be targeted:
- “The regeneration of urban institutions within the greenbelt can provide a community focus for new developments.”*
- 4.11 Conditional support was given to regeneration by some, indicating that it must be “part of a wider strategy for growth.” The importance of regeneration in rural areas was also highlighted:
- “Current policies work against regeneration in rural areas and this must be addressed by more innovative policies and recognition of the different dynamics for rural areas.”*

Balancing need

- 4.12 Comments passed on the issue of balancing needs centred on three topics. A number of respondents highlighted existing imbalances between the City, suburban and rural areas. Views supporting additional development in both Aberdeen City and in rural settlements were made:
- “A balanced approach to development in the city, towns and villages is desirable to achieve the stated draft vision”*
- “The majority of development should take place within and close to Aberdeen”*
- “The strategy needs to strike a better balance than what has been shown previously by being more positive towards appropriate development on the edge of existing towns and villages.”*
- 4.13 The need to plan utilising the existing hierarchy of settlements throughout the North East was stressed:
- “The social, economic and political reality for Aberdeenshire itself must take account of the structural hierarchy of large town, small town/village and countryside and the planning policies should reflect this.”*
- 4.14 Finally the need to promote rural development and avoid the over- concentration of development in large towns and Aberdeen city was a recurring theme:
- “Concentration of housing in the larger settlements does not help keep the countryside alive. Where there are existing communities the plan should encourage some growth, especially as all main services are already available”*

Green Belt

- 4.15 Comments on the green belt centred on three main themes – the need for development within the green belt, the need to review the Aberdeen Green Belt, and to develop a green belt policy that does not constrain development.
- 4.16 A number of respondents considered that review of green belt, and release of land was inevitable both to accommodate growth, and to meet the needs of national policy:
- “The greenbelt review is essential to allow for communities to expand and encourage economic growth”.*
- “Following guidance set out in SPP21 which advocates a review of the greenbelt, a reassessment of the Aberdeen City Green Belt should be carried out and the boundaries should be re-drawn to provide for planned long term growth”*
- 4.17 Comments were raised on the problems the existing green belt has created in Aberdeen:
- “A tight green belt around the city has constrained development and contributed to escalating property values. The structure plan should consider more flexible and/or alternative approaches to the green belt issue as part of the spatial strategy.”*
- 4.18 Concern was also expressed by a few that any future green belt policy should not be as restrictive as the existing structure plan policy in terms of the types of development permitted within the green belt:
- “Existing green belt policy has had over-stringent application of its negative connotations. This has led to an area of minor rural dereliction.”*

Housing

- 4.19 This issue attracted the largest number of comments, with a focus on the supply of land for housing and the need to provide choice.
- 4.20 A common view raised was that there is a lack of housing in the region which is having an adverse effect on the affordability and choice of housing and consequently more land needs to be released to address this problem. It was highlighted that:
- “The plan needs to honestly recognise the current deficiencies in supply which are fuelling land values and making houses more and more un-affordable.”*
- 4.21 It was also maintained that a lack of land supplied for housing has had an adverse effect on design and led to:
- “Bland and unattractive developments and has also contributed to house inflation”*
- 4.22 Some respondents were of the view that an increase in the housing land supply is required to attract industry to the area and allow the economic growth of the area:
- “[there is] a strong belief that constraints on housing land supply have precluded the Aberdeen City region from moving forward as fast as it might otherwise have done”*
- “historic build trends do not assist growth and we should not be planning for decline”*

- 4.23 Some views were expressed that more housing should be allocated more evenly throughout the region:
- “The current split of housing allocations between the Aberdeen and Rural Housing Market Areas is not appropriate; development should be more evenly spread to a wide variety of areas.”*
- 4.24 An opinion was expressed that more development should be concentrated in Aberdeen to “combat the net migration out of Aberdeen.”
- 4.25 Some were of the view that greater consideration should be given to allocating more houses to small settlements and the rural area in general:
- “More smaller allocations, particularly in rural areas should be provided for in the Structure Plan”.*
- 4.26 Some respondents shared the opinion that there needs to be a greater choice in terms of housing type, size and location:
- “There is a need for a range of new housing in a range of new communities”.*
- 4.27 It was maintained by some respondents that there is a lack of suitable accommodation for families in the City:
- “The neglect of building family housing in the City calls for a long term response by way of strategic Greenfield land release”.*
- 4.28 The need for affordable housing in the region prompted one suggestion that:
- “new housing within the region’s villages should be limited to affordable housing.”*

There were some responses regarding the need to establish the level of required affordable housing for the region. It was claimed that:

“The structure plan needs to be informed by up to date housing needs information and local housing strategies”.

“It is essential that a new Housing Needs Assessment is carried out as existing assessments are currently flawed.”

Design

- 4.29 The importance of design was stressed:
- “Design should be embedded at all levels, from strategic to local level, such as from the scale of new settlements, urban expansion areas and major infrastructure projects, down to public realm projects and individual buildings.”*
- “It would be inappropriate for the structure plan to be prescriptive on detailed design matters, but it could set a high target in terms of design and layout (e.g. to place a duty on Councils and developers to produce masterplans and where appropriate development briefs for strategic sites), but leave the detail of how it is to be secured to local plans, master plans and development briefs.”*
- 4.30 Views supporting both contemporary and traditional design were expressed:
- “More adventurous architecture needs to be considered to create interest.”*
- “Design is hugely important, but local vernacular and vision has been lost in current housing developments, which all look the same as everywhere else. Poundbury is a good example of a mixed-use development, which leads to a*

reduction on traffic mileage and an improved society, and reflects local architectural traditions.”

- 4.31 A number of respondents cited the need to avoid creating “concrete jungles”, and to not allow bland housing developments, as have recently been built:

“Most new developments are bland and consist of only rows of tightly packed houses. There needs to be a better balance of local amenities and green networks, with each settlement having their own ‘village square’ to provide a sense of community focus. Existing developments focus on short-term developer gains (e.g. profits), whereas the long-term benefits of reducing social exclusion and crime through well-designed places should be considered.”

Shopping

- 4.32 Several issues relating to the provision of shopping facilities were raised repeatedly. In particular, stress was placed on the need for the plan to contain clear, well-researched policies as to where new shops should be located:

“Retail policies should be based on up-to-date and accurate information.”

“[With regard to retail development] we have to be clear about what is over-provision and inappropriate in size and type of operation.”

- 4.33 A number of responses were against out-of-town shopping developments, or suggested that fewer should be provided in future. Three responses were phrased particularly against the development of supermarkets or superstores. In relation to this, a number of responses called for a balanced approach to out-of-centre and town centre shopping development.

“[The Issues Report] should also emphasise the threat to centres posed by out-of-town, car-dependent development.”

“The development of large supermarkets should be balanced by a consideration of the needs of local traders, in central locations.”

- 4.34 Comments were also received on maintaining and improving shopping provision across the region and on the need to improve access to future developments (e.g. by non-car modes of transport). Several responses urged that maintaining the role of existing shopping areas should not be at the expense of providing some facilities within large housing developments, for local need:

“While endorsing the need to support the role of existing shopping areas, there is a need to include shops as part of mixed use local community provision.”

Economic potential

- 4.35 Some thought that the text used in the Issues Report, in order to stimulate debate on the issue of economic development, gave the impression that the Councils were seeking to plan for economic decline:

“It is a concern that the plan seems to be addressing economic uncertainty rather than economic expansion and stability.”

- 4.36 In several responses, it was suggested that the plan should aim to attract skilled workers to the region:

“To ensure the growth of the economy, the plan must also take steps to attract further skilled employment to the area.”

- 4.37 While the need to address the continuing needs of the oil and gas industry was highlighted, tourism, the rural economy, and expansion of the regional economy into new and emerging sectors, was also stressed:

“Tourism is a key contributor to the economy of the region and leisure facilities are vital to many rural communities.”

“The land allocations of the plan should reflect the changing nature of business needs and the need to foster transition and growth from oil and gas to a wider energy economy and emergent new technologies.”

“The contribution rural businesses make should not be forgotten about.”

“As agriculture and forestry respond to reforms of agricultural and rural policies, the opportunities for alternative business development and diversification should be recognised within the structure plan.”

- 4.38 The need to provide a sufficient amount of employment land, to provide for the current needs of the region and also to provide for future growth was emphasised:

“The region needs to be welcoming to all business and not just to renewable energy and this implies an availability of business land and housing options on a much wider scale than is currently on offer.”

- 4.39 The location of employment land was also an issue which respondents gave consideration to, both in terms of the principles that should be used to govern employment land location, and specific areas deemed appropriate:

“By focusing business and industrial development in Aberdeen and along transport corridors, the plan would provide new developments with good access to markets and to a working population base.”

“We would support developments that have both housing and employment land located in close proximity.”

Transport

- 4.40 Several comments noted that the transport-related effects of development should be taken into account by the plan, and that a “joined up approach was required to landuse and transport issues. Related to this, some suggested that business development and housing should be located in close proximity to one another, to reduce commuting distances and reduce the need to travel by car:

“We think that new housing should be located close to employment areas; they should be linked with public transport initiatives on transport corridors, such as the AWPR.”

“The plan will have to address how the traffic implications of the allocations strategy can be accommodated by existing and proposed roads infrastructure. Previous concentration of development has exacerbated the problem.”

“Road transport by private car should be discouraged.”

“A more joined-up approach is necessary to deal with North East transport issues, with a strategy that is integrated and adequately funded to meet the aims of the National Transport Strategy and its goals.”

“A robust strategy for the plan would encourage rail travel, but would also promote a sustainable use of the existing and programmed road network.”

- 4.41 A number of comments raised concerns specific to public transport (e.g. the cost of travel) that the structure plan cannot address and that should be dealt with by the Regional and Local Transport Strategies.
- 4.42 Several responses put forward the view that the development of the AWPR would be important for the future of the region.
- 4.43 A few comments suggested that the dispersed nature of existing development in rural areas of Aberdeenshire should be taken into account, in planning for sustainable development.

“The plan should recognise that by its nature the Shire is different from the City and is not well served by public transport. Land being released for development should relate, where possible, to the main routes served by public and other transport modes.”

Infrastructure

- 4.44 A key theme which emerged from a number of respondents was that an adequate amount of land has to be allocated in order to provide sufficient infrastructure:

“Development needs to be of a sufficient scale to pay for additional infrastructure.”

“Sufficient land requires to be released to create a co-ordinated approach to the provision of infrastructure.”

- 4.45 Some respondents shared a view that existing infrastructure capacity should be increased to accommodate development:

“Aberdeen and its immediate area has an advantage of a critical mass of existing services/infrastructure, which make it easier to support new development or enhance existing provision to meet demand”

“The correct locational approach to development can improve existing infrastructure”

- 4.46 Some respondents did not share this view point and stated that:

“Provision should be made to ensure that land is not simply allocated in areas where infrastructure capacity exists, but where people want to live”

“Consideration requires to be given to locating new infrastructure capacity where people wish to live as well as where supply can be most cost-effectively delivered.”

Climate Change

- 4.47 Comments on this issue vary, from promoting sustainable patterns of development, to encouraging the use of renewable energy technologies and to reduce the likelihood of flooding. Concerns about the relative importance of environmental factors and economic and social issues were highlighted:

“Any future policy relating to climate change should be led by national guidelines and should balance the need for growth and the environment.”

“The structure plan should continue to promote sustainable patterns of development, and reduce society’s effects on the environment...”

“The plan should not fight climate change, but work with the consequences of it, such as developing on higher ground rather than to hold the sea back.”

- 4.48 A number of comments were received on flooding issues, which focus on positive flood management schemes:
- “Strategic direction should be given towards the positive management of flooding, namely through flood plain restoration.”*
- “Identify flood zones to protect potential flood affected areas outwith built up areas.”*
- 4.49 Half of all the comments received on this topic referred to renewable energy. Comments raised include encouraging the need to embrace renewables, and to include a positive planning policy that reflects the criteria set out Scottish Planning Policy 6: Renewable Developments:
- “Standards should be set for both new and existing buildings to reduce energy consumption. This includes local heating/generation schemes, reduced lighting waste, lowering carbon footprint of new roads etc.”*
- 4.50 However, caution was raised not to include a policy that requires all development to use renewable energy:
- “We would resist a policy requiring all housing developments to use renewable energy as such measures are likely to have a knock on impacts on house prices and affordability.”*
- “Policies relating to climate change should take account of the economics and commercial viability associated with development and should not affect the delivery of housing.”*
- 4.51 The opportunities rural areas could offer in terms of providing renewable energy (e.g. land and biomass crops) was also highlighted.

Heritage

- 4.52 General support is given to managing and protecting the area’s heritage, with some respondents highlighting the need to comply with national legislation. The economic benefits associated with the area’s built, natural and cultural heritage was expressed in terms of attracting inward investment, boosting tourism, providing quality of life, and attracting professionals:
- “We agree that protecting the area’s most significant heritage assets is a key component of the strategy geared to attracting inward investment and creating an attractive place to live.”*
- 4.53 One respondent also noted that it is important to build the heritage of the future:
- “The plan should ensure that the area continues to create heritage as it grows and moves forward.”*
- 4.54 Three respondents expressed concern regarding the implications of protecting the area’s heritage:
- “managing heritage resources in the long term creates a financial burden to owners [and that owners are] further hindered by the lengthy planning process”.*
- “Heritage must not be used as an excuse for doing nothing and allowing older buildings to deteriorate. Positive encouragement for the sympathetic development of heritage sites must feature in future plans.”*

Other Key issues

- 4.55 Few common themes emerged in this section whereby a large number of respondents commented on similar issues. A small proportion of the comments which were categorised in other key issues did not relate directly to the Structure Plan.
- 4.56 Some of the respondents made recommendations for the new Structure Plan:
- “The Structure Plan should be a document that is used to direct development in a suitable fashion and not always constrain it.”*
- “The structure plan certainly could determine where –and how much- development should take place, however it would be better if it could be made to be more responsive throughout its lifetime, by a rolling programme of regular reviews.”*
- “It is likely that the new Strategic Development Plan will have to be more determinedly strategic than the current structure plan. It will have to take a longer term view and be more flexible-it should recognise the rate at which technological and socio-economic change is occurring.”*
- 4.57 Some respondents also raised concerns that rural issues need to be sufficiently addressed in the new plan:
- “Given the largely rural nature of the structure plan area, it is essential that the structure plan policies and strategies address the social and economic challenges in rural areas.”*
- “Rural issues are not adequately addressed in the thirteen issues in the issues report and it may be that this is another issue to be addressed”*
- “While the 13 issues are fully relevant to the Structure Plan, it is important to recognise the interaction between these issues in both accessible and remote rural areas.”*

Comments on the other documents published

- 4.58 Although not directly sought, comments on both the Report of Survey and Development plan scheme were received. The responses to the Report of Survey largely drew attention to factual inaccuracies in the document; while the comments on the Development Plan Scheme questioned the reasoning behind preparing a new structure plan and its relationship to the Planning etc (Scotland) Act 2006:
- “We agreed with the reasons set out in the development plan scheme for reviewing the extant NEST structure plan” although “did not agree that there is any justifiable case to delay the preparation and introduction of up to date strategic guidance until after 2011.”*
- “The timetable schedules the publication of the draft Action Programme after the publications of the draft plan, which is contrary to legislation”*
- “It is unclear whether the new plan is a Structure Plan under the terms of the current planning system or a Strategic Development Plan under the new Planning Act.”*

5 Summary

5.1 The main points that arise from the consultation on issues are:

- There is general support that these are the issues that the plan needs to take into account. Rural development is identified as an additional topic in its own right.
- The weight of responses on the housing and economic potential topics singles these out as being of primary importance in the plan.
- Integration of transport and land use has also been highlighted as a singularly important aspect of the plan.
- The need to respond to the anticipated changes in many of these topics over time, and to have a plan that is sufficiently robust to respond to these changes was also a significant theme in the responses.

APPENDIX 4: Locations for development

1 Introduction

- 1.1 This report gives consideration to the comments received on Question 3 in the Issues Report. These comments were made in response to a specific question:

Question 3

Do you have any general views on where new developments should take place, or where it should not take place, and why?

- 1.2 The Issues report identified that the most important part of the next structure plan is likely to be identifying the most appropriate locations for all types of new development (the spatial strategy). It noted that the spatial strategy will set out the type and amount of development needed in different parts of the area.

2 Overview

- 2.1 200 comments (out of 1004) were recorded on the topic of where development should be located, representing 20% of all comments made. 46% of those responding were professional consultancies or development companies, promoting their, or their clients' land interests.

3 Responses

- 3.1 Comments were subdivided into those relating to individual and specified locations for development, and comments that could be taken as support for the different applications of the strategy. Reference has been made to the strategic options on which stakeholder engagement has been taking place where this was appropriate.
- 3.2 The following table details the number of comments received for each subtopic identified within the comments made on Question 3:

Table 1: Written Representations on location of development

	Number of comments	As percentage of all comments
General comments	14	3.8%
Development “bids”	38	3.5%
Restraint (location specific)	6	3.2%
General comment on spatial strategy	43	4.2%
Balance	17	1.7%
Major and minor strategic themes	3	0.3%
Growth scenarios	13	1.3%
Aberdeen City growth	11	1.1%
New settlements	19	1.9%
New transport corridor	3	0.3%
Edge of city settlements	3	0.3%
Dispersal	12	1.2%
Transport corridors	13	1.3%
Key settlements	5	0.5%
Total	200	20%

4 Analysis

General comments on locations for development

- 4.1 The comments received on this topic considered both the means of identifying locations for development and the looked for outcomes from that process. The specific need to consider current national policy and other strategies operating in the area was highlighted.

Development ‘bids’

- 4.2 While the consultation did not request their submission, a large number of bids for specific locations were made in response to the Issues Report. At this stage in the process these bids are taken as support for a particular spatial strategy, and as a demonstration of the ability to implement such a strategy. As a result these comments will be factored into the technical evaluation of potential strategies for the structure plan.
- 4.3 Bids have been made which support the concept of enabling small-scale development to meet ‘local needs’ throughout the area, dispersal of development across Aberdeen and Aberdeenshire, edge of City communities, development in the existing rail / road transport corridor, key settlements, villages along the AWPR, development in Aberdeen City, new settlements and development in a new transport corridor.

Restraint (location specific)

- 4.4 A small number of comments were received which argued against further development in certain locations. Westhill and Alford were cited in this context.

Spatial strategy – General comments

- 4.5 Many of the general comments passed on the issue of the spatial strategy made reference to the way that the strategy is to be determined. This included both comments on the principles that such a strategy should seek to be based and on the need for such a strategy to be tested for technical deliverability. Sustainability features highly in the set of principles on which the spatial strategy should be developed:

“Any land allocations should relate closely to policy objectives, with sustainability being the core objective, although market demand and the support for rural locations are also key objectives, and some element of the land allocations should support these”

“Strategic options should be strenuously tested with utility providers before they are finalised.”

“Locating new homes in locations where commuting can be encouraged to be more sustainable must be a core requirement of the spatial strategy.”

- 4.6 The importance of the proposed Aberdeen Western Peripheral Route to the future travelling and commuting patterns around Aberdeen has been highlighted:

“One of the main issues for the area is the AWPR and the plan will have to clarify its role in relation to releasing development land.”

- 4.7 The needs and impacts on existing areas also require to be considered in the context of the strategy:

“The plan needs to consider what we are to do with existing areas, are we going to redevelop them or let them decay?”

Balance

- 4.8 Comments under this section are an expression within the strategy, of the issue of balancing needs. The majority of comments passed make an argument for allowing development in rural areas and settlements, outwith the major settlements:

“A proportion of the housing allocations provided by the plan should be directed to rural areas/communities”.

“People should be enabled to live in the region without everything being directed to Aberdeen and a handful of settlements in Aberdeenshire.”

- 4.9 There is also a thread within the comments made that promotes Aberdeen Housing Market Area as requiring to be given a greater proportion of allocations:

“The weighting of development should be greater than 75% towards the Aberdeen Housing Market Area.”

Growth scenarios

- 4.10 Comments on the scale of development were identified as being associated with low growth (maintenance of population in line with forecasts), medium growth (the *status quo*) and high growth. Only one comment received promoted a low growth scenario, with all others supporting medium and high growth:

“The key aim should be to maintain and grow the population.”

“A carefully planned high growth scenario is most appropriate for the City region.”

Aberdeen City growth

- 4.11 The need for Aberdeen City to be the focus for growth in the region was highlighted by a number of respondents, with models for this development being suggested as urban expansion, substantial greenfield development to infill to the AWPR, and on the transport corridors into the city:

“There is no realistic prospect of the City being challenged as the economic engine for the wider area, and as the focus for jobs, services and public transport, and in the interests of achieving sustainable solutions, it will be essential to maximise the capacity of the City to support new housing developments, particularly family housing.”

New settlements

- 4.12 New settlements were proposed by a limited number of respondents as a viable strategy to follow. The vision respondents had for a new settlement included the concept of small new “eco-villages” as well as settlements of the scale of Westhill:

“Many of the existing settlements within Aberdeenshire are reaching their notional capacity in terms of landscape, infrastructure and distance to amenities. The structure plan should take a significant number of the required units and employment land and plan an overall settlement rather than continuing the incremental expansion of existing settlements.”

- 4.13 One respondent argued the opposite case:

“The plan should consider placing new developments adjacent to existing established towns and settlements, where a good number of services already exist. New services should be added to contribute to the whole, not to take away from what is already provided.”

New transport corridor

- 4.14 The possibility of development on the Aberdeen – Peterhead axis was supported by those promoting the ACSEF “Energetica” proposal and those with substantial business interests in the area. This support was balanced by the following view:

“We do not support a new transport corridor from the City to Peterhead, as this runs contrary to market locational preferences, would be very costly, and difficult to deliver within the plan period.”

“Edge of city” settlements

- 4.15 The focus for the limited number of responses that promoted development in edge of city settlements linked these to the AWPR. Development at the interchanges of the AWPR were promoted:

“The realisation of the AWPR will present development opportunities at the major interchanges. Development at these locations would constitute sound economic use of a major capital investment.”

Dispersion

- 4.16 Some respondents argued that the scale of housing land releases would require development to take place everywhere and that to do so would preserve rural

facilities, avoiding the social problems associated with town and city living and promote choice:

“In order to maintain a population large enough to improve the services, promote the wider interests of the community and improve quality of life, it will be necessary to adopt a strategy to promote a dispersed distribution of development which focuses smaller housing allocations in rural areas to provide the critical mass to attract the investment required in public transport, facilities and services in the area to sustain communities and facilitate further growth.”

“People should be able to live throughout the entire area of the city and shire. It shouldn't be necessary to direct the vast majority of development to Aberdeen and the three or four largest towns in Aberdeenshire.”

Transport corridors

- 4.17 There was considerable support for the notion of developing in the existing transport corridors, particularly the rail corridor from Stonehaven to Inverurie (and beyond). Facilitating public transport was the reason most often provided for this choice. The perils of concentrating development on already busy routes were highlighted.

“The preferred spatial model should be to concentrate development and thereby ensure population growth along existing and planned transportation corridors to the South, West and North of the City. This will avoid the detrimental environmental and cost impacts which some of the alternative models require and would achieve the critical mass in relation to the provision of transport, business, social, and educational infrastructure.”

Key settlements

- 4.18 A number of respondents considered that continuing development of those settlements with a strategic role was an appropriate strategy:

“Greater emphasis should be placed on promoting appropriate opportunities for housing in and around existing settlements across the whole area, and not necessarily focusing the majority of development within the Aberdeen Housing Market Area.”

5 Summary

- Growth in the city region is a clear aspiration.
- The importance of Aberdeen City as a focus for development has been highlighted.
- The need to provide a base level of opportunity across the whole of the city region, irrespective of the spatial strategy is clearly supported. This is evidenced by support for a level of dispersal and the growth of existing towns throughout the area.
- Beyond the above, there is no clear consensus as to locations for development.
- There is support for continuing to promote development in edge of city communities and the Inverurie – Stonehaven corridor.
- Existing interests in land have played a significant part in the responses received to this question.