

APPENDIX 1

Aberdeen City and Shire Strategic Development Plan

Main Issues Report - Consultation Report 2012

March 2012

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Consultation Report 2012

1. Purpose

- 1.1. The purpose of this report is to outline the activities carried out and the response received to the consultation on the Aberdeen City and Shire Strategic Development Plan Main Issues Report.

2. Background

- 2.1. The Aberdeen City and Shire Strategic Development Planning Authority (SDPA) is a partnership of Aberdeen City and Aberdeenshire councils with a primary purpose of preparing and keeping under review a strategic development plan for its area.
- 2.2. Scottish Ministers approved the Aberdeen City and Shire Structure Plan in August 2009 and good practice would suggest the need to submit a strategic development plan to them by August 2013 for approval.
- 2.3. The SDPA publishes its programme for the preparation of its strategic development plan in its development plan scheme (DPS) which is updated annually. The timetable is published in March each year and the current version (2011/12) was published in March 2011 and is attached at Appendix 1.

3. Main Issues Report

- 3.1. The first formal stage in the preparation of a strategic development plan is the preparation of (and consultation on) a main issues report.
- 3.2. The Main Issues Report was agreed by the Aberdeen City and Shire Strategic Planning Authority (SDPA) on 23 September 2011 and published for consultation on Friday 7 October 2011. Consultation took place over a 13 week period with a closing date of Friday 6 January 2012.
- 3.3. The Main Issues Report was accompanied by nine background documents which were published alongside it. There were:
 - a) Monitoring Statement
 - b) Housing Need and Demand Assessment
 - c) Equalities and Human Rights Impact Assessment
 - d) Strategic Flood Risk Assessment
 - e) Structure Plan Risk Assessment
 - f) Transport Background Paper
 - g) Climate Change Study
 - h) Habitats Regulations Assessment
 - i) SEA Interim Environmental Report
- 3.4. In addition to the Main Issues Report having a 'Crystal Mark' from the Plain English Campaign, an audio version of the document was also available.

4. Activity

Consultation Period

- 4.1. Given the importance of the engagement on the MIR, the DPS (March 2011) identified that we would consult for a 12 week period. It was decided at the meeting of the SDPA in September 2011 that this would be extended to a 13 week period to avoid consultation closing between Christmas and New Year.
- 4.2. A few consultees highlighted the challenges of a consultation ending in early January, with one suggesting that this was contrary to the National Standards for Community Engagement. While a shorter period ending in early January would clearly have been problematic, the consultation spanned 13 weeks and gave ample opportunity to respond prior to Christmas. In addition, a letter was sent to all giving between three and four weeks warning of the consultation period, identifying the website as a source for advance sight of the documents if required prior to being agreed and published.

Circulation

- 4.3. Four means were used to circulate copies of the Main Issues Report during the consultation period, with around 700 hard copies of the Main Issues Report being distributed in total in addition to the electronic circulation.

Consultation Database

- 4.4. Copies of the press notice, MIR and two leaflets were sent out to all contacts on the SDPA database. This included all Community Councils, Key Agencies and other interested individuals and organisations.

Deposit

- 4.5. Copies of all consultation documents (the Main Issues Report, nine supporting documents, the press notice and a letter explaining the consultation) were made available at the 58 public libraries across Aberdeen and Aberdeenshire as well as the seven planning offices operated by the two councils and the offices of the SDPA. One full set and two additional copies of the MIR were also sent to Scottish Ministers.

Website

- 4.6. All consultation documents were published on the SDPA website on 7 October 2011, along with a copy of the press release issued to coincide with publication.
- 4.7. Early in the consultation period a 'Word' document was added to the website which extracted the consultation questions from the MIR to aid responses. Also added was an audio version of the MIR in mp3 format.
- 4.8. More information on the use of the website is provided in sections 6 and 11 below.

Consultation Events

- 4.9. Copies of all the consultation documents were available to review at the consultation events, with copies of the MIR itself available to take away.

Publicity

- 4.10. Publicising the consultation on the MIR was a key activity before, at the start and during the consultation exercise.

Press Releases

- 4.11. Two press releases were issued during the consultation period, one at the start of consultation (Appendix 2) and one with a week to go before the deadline (Appendix 5). These were sent to a range of national, regional and local media organisations.

Press Notices

- 4.12. Two press notices were published during the consultation period. The first of these was on the day that consultation commenced, outlining the purpose of the consultation and how to access the documents (Appendix 3). The second press notice was published to announce the seven consultation events taking place during December (Appendix 4).

Website

- 4.13. Both press releases were placed on the SDPA website on the date of issue and two additional news items were published on the website during the period of consultation. These provided information of the consultation events as well as a reminder with two weeks to go.

E-Updates

- 4.14. Five e-updates were issued to those registered on the SDPA website between September 2011 and January 2012, with four of these highlighting the MIR consultation. One was sent on the day papers were made available online for the SDPS meeting which agreed the MIR and a second was sent on the day consultation started. A further update was sent to highlight the consultation events, while the last was issued two weeks before the close of consultation as a reminder of the closing date. Each update was sent to an email list of approximately 160 people who had registered on the SDPA website, with 14 new registrations between 19 September 2011 and the close of consultation.

Tellmesotland.gov.uk

- 4.15. The main press notice was placed on the www.tellmesotland.gov.uk website, a portal for accessing public information notices issued by local authorities across Scotland.

Press Coverage

- 4.16. A range of media organisations including the Press and Journal, Evening Express and weekly papers in Aberdeenshire picked up on the consultation, both at the start of the consultation period as well as with a week to go. An additional outlet was the websites of these publications

Other

- 4.17. Other mechanisms in addition to directly mailing out copies of the MIR (see para 4.4 above) included Newsletters published and circulated electronically by lawyers and planning consultancies. One example is Dundas and Wilson’s “Development Plan Progress in Scotland” newsletter which is set out by email to around 500 people each month.
- 4.18. A range of community websites also picked up on the consultation, either reproducing the press release or summarising it for the local context.

Consultation Events

- 4.19. A total of 14 events took place during the consultation period.
- 4.20. Some of these events were dedicated to the consultation and organised by the SDPA, while others covered the Main Issues Report either on its own or as part of a wider agenda and were organised by third parties.

Dedicated events

- 4.21. A total of 7 consultation events took place during December 2011. The events took place in Aberdeen, Banchory, Banff, Ellon, Inverurie, Peterhead and Stonehaven between 3:30 and 7:30pm and were designed to both raise awareness, answer questions and encourage responses.
- 4.22. Attendance at the events varied considerably, although those who did attend appreciated them and found them useful, with one resposdee indicating their value in the consultation response submitted.
- 4.23. A number of those who attended these events subsequently sent in responses to the consultation, although a number were able to identify that it did not raise any concerns for them which would justify a response.

Other events

- 4.24. Presentations were also made to a range of groups during the consultation period in addition to those specifically organised by the SDPA. These included:
- North East Scotland Transport Consultative Forum
 - Grampian House Builders Committee of Homes for Scotland.
 - ACSEF Planning Modernisation Group
 - Aberdeen Land Use Forum
 - Aberdeen Community Council Forum
 - Aberdeenshire Housing Strategy Steering Group
 - Aberdeenshire Community Planning Partnership

4.25. These events reached a wider audience of partners and stakeholders and were useful in raising awareness of the strategic development plan in general and the Main Issues Report consultation in particular.

5. Responses

5.1. A total of 85 responses were received to the consultation exercise on the Main Issues Report.

Method of response

5.2. Four options were available to people in terms of their method of response to the consultation.

5.3. As can be seen from Figure 1, the majority of responses were made by email (68%) and only 15% were made in hard copy. Most of those submitting responses in hard copy were agents acting on behalf of development interests. Only one response was submitted in hand-written form.

Figure 1: Format of Responses

	Responses	Percentage
Paper	13	15%
Online	14	16%
Email	58	68%
Fax	0	0%
	85	100%

Timing of Responses

5.4. The consultation period opened on 7 October 2011 and closed on 6 January 2012. However, no responses were received during the first seven weeks.

5.5. As shown in Figure 2, while most responses were submitted during the 13 week consultation period, 12 responses (14%) were late

Figure 2: Valid and late responses

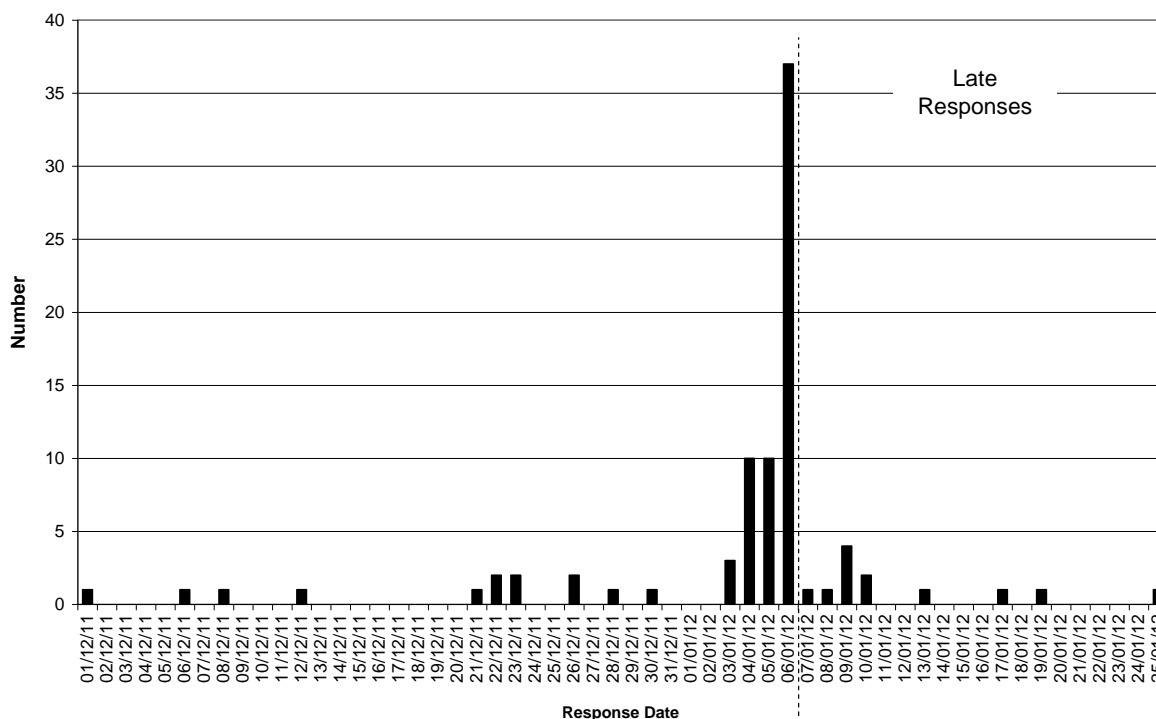
	Responses	Percentage
On time	73	86%
Late	12	14%
	85	100%

5.6. **Error! Not a valid bookmark self-reference.** shows that, although responses were submitted throughout December and the first few weeks in January, the majority of responses were made in the final week of the consultation period (71%) or the week after the close of consultation (11%). A total of 37 responses (44%) were made on the final day – 6 January 2012. A more detailed breakdown is shown graphically in Figure 4 below.

Figure 3: Timing of responses

Week Commencing	Responses	Percentage
26 November 2011	1	1%
3 December 2011	2	2%
10 December 2011	1	1%
17 December 2011	5	6%
24 December 2011	4	5%
31 December 2011	60	71%
7 January 2012	9	11%
14 January 2012	2	2%
20 January 2012	1	1%
	84	100%

Figure 4: Timing of consultation responses



Source of responses

5.7. Responses were received from a range of sources as set out in

Figure 5 below.

Figure 5: Source of responses

	Responses	Percentage
Adjoining Authorities	1	1%
Key Agencies ¹	7	8%
Developers	28	33%
Businesses	12	14%
Individuals	22	26%
Councillors	2	2%
Community Councils	10	12%
Community Groups	3	4%
	85	100%

5.8. It can be seen that, developers and individuals submitted almost 60% of responses between them, with other businesses and Community Councils also well represented. Only one adjoining authority responded to the document.

6. Website Activity

6.1. The SDPA website was a valuable communication tool during the Main Issues Report consultation phase.

6.2. Almost 1,500 unique visitors accessed the website during the consultation period. As shown in Figure 6, this was a significant increase on the previous 13-week period.

Figure 6: Total website visitors, visits and page views during consultation period

	7/10/2011 – 6/1/2012	Increase on previous 13 weeks
Unique Visitors	1,491	55%
Visits	2,467	69%
Page Views	8,993	78%

6.3. As can be seen from

¹ The Scottish Government’s response incorporated responses from Transport Scotland, Historic Scotland and Forestry Commission Scotland. A response was also received from the neighbouring Regional Transport Partnership (TACTran).

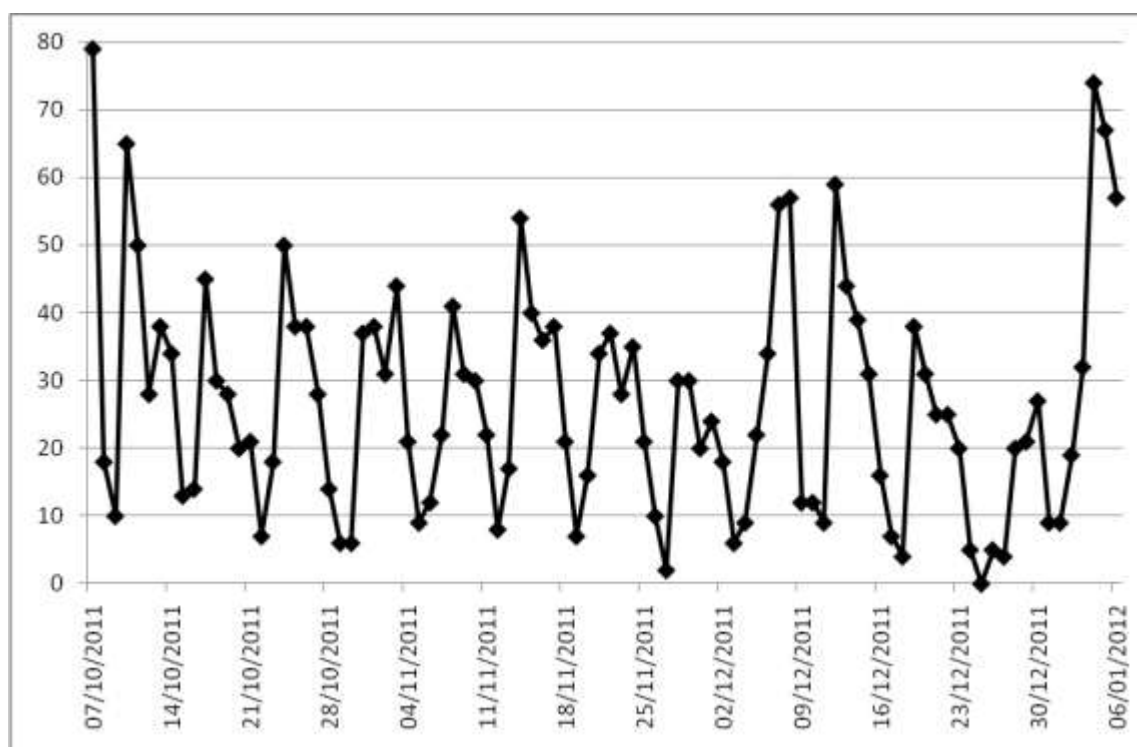
Figure 7, website activity was consistent throughout the first four days of the working week, with lower levels on Fridays and at the weekends. Christmas Day was the only day when the site didn't receive any visitors.

Figure 7: Website visitors by day of the week

	Average website visits per day	Total website visits per day
Monday	37	480
Tuesday	35	449
Wednesday	35	454
Thursday	35	458
Friday	27	383
Saturday	9	117
Sunday	10	126
	27	2,467

6.4. This pattern of activity is shown graphically in Figure 8 below.

Figure 8: Unique website visitors during consultation period



7. Response summaries

7.1. Summaries of the 85 consultation responses are included in Appendix 7.

7.2. At the current time these responses have not been analysed in any detail. However, this will be done over the coming months as work progresses with the proposed plan and reported back to the SDPA.

8. Acknowledgements

8.1. Acknowledgements were sent out to all those who responded to the consultation. Most acknowledgements were sent out on 10 January (73 out of

the 85), although those submitted before Christmas were acknowledged before Christmas and those submitting after 10 January received theirs at a later date. Five responses were acknowledged in hard copy where no email address was provided but the majority were acknowledged by email.

Appendix 1: Development Plan Scheme 2011/12

[to be included in published document]

Appendix 2: Initial press release

City and Shire launch public consultation to help deliver vision for the region's future

Aberdeen City and Shire Strategic Development Planning Authority (SDPA), on behalf of Aberdeen City and Aberdeenshire councils, launched a public consultation today (October 7) to discover what residents and stakeholders think of potential changes to its blueprint for the future.

The consultation, which will last for 13 weeks, encourages people to give their views on a new report focusing on the issues facing the region as it looks to maintain and enhance its attractiveness and continues to develop sustainably until 2035.

The SDPA and both councils had previously agreed a Structure Plan in 2009 mapping out their long-term plan but in accordance with changes in Scottish planning laws the Strategic Development Planning Authority must now submit a Strategic Development Plan to Scottish Ministers in 2013.

Using the current structure plan as its foundation, the new report – which was discussed by City and Shire councillors at a meeting of the SDPA on 23 September – focuses on the main issues arising in the past two years which must be addressed in the strategic plan. The report offers an insight into how both Aberdeen City and Aberdeenshire can tackle the impact of the global recession and climate change in order to deliver the aspirational vision of the region's future.

Highlighted in the report are a list of new groundbreaking proposals designed to generate sustained economic development, including plans for a strategic transport fund, the development of Peterhead as an electricity transmission hub and making provision for carbon capture and storage.

Chair of the Aberdeen City and Shire Strategic Development Planning Authority Councillor Peter Argyle said: "This main issues report marks a significant step in delivering a strategic development plan to Scottish Ministers in 2013.

"The report proposes a new way of dealing with the effects of new developments on the transport network and highlights the importance of making changes to the way we manage our waste as well as a range of exciting proposals.

"We want to hear the views of communities and others with an interest to help us prepare the proposed strategic development plan next year."

Vice chair Councillor Kate Dean said: "This report makes it clear we want to roll forward the plan we made in 2009. But time moves on and this report highlights the new challenges we face and some of the options to deliver our long-term vision for the North-east.

"It is important residents' voices are heard as this plan will be integral to maintaining Aberdeen City and Shire's status as a great place to live for generations to come."

The purpose of the strategic development plan

The new strategic development plan aims to set out a framework to develop Aberdeen City and Shire up to 2035. The document will map out a framework for the delivery of new homes, businesses, transport infrastructure and facilities to ensure continued prosperity. It will replace the structure plan, which was agreed by councillors from both councils and approved by Scottish Ministers in 2009, taking into account two major new influences in the form of climate change and the challenging economic times of recent years.

The main issues report highlights the areas of the existing structure plan where changes may be needed and offers new proposals to target transport improvements, continued economic development and managing waste and recycling levels in line with national guidelines.

The public consultation wants to get people involved, encouraging debate ahead of preparing the proposed plan for submission to Scottish Ministers in 2013.

Sustainable economic growth

The main issues report recognises that the current structure plan was positive about new development and ambitious in its vision – supporting a significant improvement in the quantity and quality of new development. While not immune to the impacts of global financial turmoil, the area has been one of the most robust in the UK.

The strategic development plan must take into account the economic challenges facing the region, which although less marked than elsewhere cannot be ignored.

The main issues report emphasises a need to develop better transport systems in order to deliver growth as well as the need for improved digital infrastructure (such as super-fast broadband). The proposals highlighted in the report also emphasise the importance of sustainable economic growth, emphasising projects which can have a major impact on mitigating the effects of climate change.

Supporting development

With public sector money already committed to a large number of critical transport projects, including the Aberdeen Western Peripheral Route (AWPR), the Haudagain roundabout, Aberdeen to Inverness rail improvements and the A90 Balmedie to Tipperty dual carriageway, the report recommends alternative funding methods are a necessity.

In order to sustain development the report highlights a groundbreaking proposal to generate more than £80 million for a strategic transport fund to deliver additional vital transport projects for the area. The details of the strategic transport fund (developed in partnership with Nestrans and Transport Scotland) is subject to a separate consultation also launched today (October 7).

All housing, business, industrial, retail and commercial leisure developments (subject to criteria) will be expected to make a contribution to the fund, which would be designed to create an estimated £86.6million central pot to improve transport projects expected to be completed by 2023.

Developers working in the city and main development corridors in Aberdeenshire would pay a fixed amount (depending on the nature and scale of development) to pay for the action needed. Under the present guidance the formula for contributions would equate to average contributions of £2,064 per house unit and £62,010 per hectare for non-residential uses.

Areas of transport infrastructure identified as potential benefactors, include:

- Bridge of Dee improvements
- New rail station at Kintore
- Improvements to the junction capacities to the A96 and upgrading the AWPR at Kingswells North Junction
- Upgrading A944 junctions and safety improvements on the access road to the A93
- Improvements to junction capacities on the A956 and A90 and a River Dee link
- Parkway, Persley Bridge and Parkhill junction capacity improvements
- Bus priority measures and frequency improvements
- Extra bus services linking new development to important employment destinations

Nestrans as the Regional Transport Partnership would hold and administer the fund in a ringfenced account.

The monies in the account will only be available for delivering strategic transport projects in the identified locations, including detailed assessment, development and design work. An annual report will be published clearly setting out the balance sheet of the fund and the projects progressed during the year.

The consultation into the strategic transport fund runs in parallel with the strategic development fund for six weeks and will conclude on 18 November. Homes for Scotland, Grampian House Builders Committee and chartered surveyors across the North-east have already been consulted and given feedback.

The main issues report also emphasises that with the decline in Scottish Government funding for affordable housing it will be vital to focus on delivering what is achievable rather than aiming for the unattainable and that the delivery of affordable housing will only be achieved with significant levels of housing provided by the private sector.

Managing Aberdeen City and Shire's resources efficiently

The report states the plan's vision will continue to emphasise the confident and courageous decisions needed to lead the way towards development being sustainable, including dealing with climate change.

The long-term aim remains to generate 100% of the electricity the City and Shire needs from renewable sources by 2020, with detailed proposals for energy and water efficiency. However, the report says the strategic plan must recognise the Scottish Government published its Zero Waste Plan in 2009, which sets down guidelines for just 5% of waste being sent to landfill by 2025 with recycling rates of at least 70% of all waste.

In order to meet the targets imposed by the Scottish Government, the main issues report proposes Aberdeen City and Shire seek significant new waste-management facilities in a range of locations and use a number of innovative technologies to

process and treat waste. To meet the extremely challenging targets the plan notes there is an urgent need to put the zero waste plan into practice.

New projects proposed for inclusion in the strategic plan

The structure plan included major projects such as the AWPR, Balmedie to Tippetty (A90) carriageway, a new community stadium in Aberdeen and prison in Peterhead.

The new report highlights a range of additional major projects to attract investment, support growth and deal with climate change - helping achieve the vision for Aberdeen City and Shire.

• Carbon Capture and Storage

This proposal focuses on capturing carbon dioxide (CO₂) from Peterhead Power Station (as well as locations outwith the area) and transporting it to St Fergus to store under the North Sea. This would significantly reduce emissions to the atmosphere which would otherwise contribute towards global warming. It would also provide an economic boost and jobs for the area. Peterhead and Longannet Power Station in Fife could capture and store around 30 million tonnes of CO₂ over 10 years. This would not only be important regionally but to Scotland as a whole and could generate significant investment and jobs.

• Electricity Transmission Hub

This proposal allows Peterhead to become a focal point in the electricity transmission network with links to England and other European countries as well as offshore renewable generation. These plans would see onshore converter stations built near Peterhead as well as onshore and offshore power cables.

One project would see Peterhead become a leading exporter of energy to north-east England with a 365km cable capable of carrying 1800MW of electricity. The cable would require a transformer plant to convert alternating current (AC) to direct current (DC) and back again. The transformer plant would be a significant development and would involve a sizeable new building to house it.

As well as the link to England the plan would also like to include support for Peterhead to become home to a sub-sea link between Scotland and Norway allowing two-way flow of renewable energy across the North Sea. Peterhead would appear to be a natural choice for the joint venture between Scottish and Southern Energy and four European partners for the NorthConnect project.

• National Renewables Infrastructure Plan

A national plan was published by the Scottish Government in July 2010 identifying 11 major locations which could support a globally competitive offshore renewables industry. The report identifies Aberdeen and Peterhead Harbours as a “subsea cluster”, capable of utilising its expertise in serving the energy sector through installing, operating and maintaining windfarms using land near the ports.

What happens next?

The 13-week consultation period on the main issues report into the strategic development plan will last until 6 January 2012, after which responses will be reviewed and a proposed strategic development plan prepared.

The six-week consultation on the strategic transport fund will last until 18 November 2011.

To take part in the consultations visit www.aberdeencityandshire-sdpa.gov.uk or email team@aberdeencityandshire-sdpa.gov.uk

A proposed version of the strategic development plan will be published in September 2012 before a further consultation is carried out ahead of an anticipated submission to Scottish Ministers in June 2013.

The plan will then be examined by Scottish Ministers with approval of the plan expected by June 2014.

7 October 2011

Appendix 3 – Start of consultation advert

**ABERDEEN
CITY AND
SHIRE** | *Strategic Development
Planning Authority*

Aberdeen City and Shire Strategic Development Plan MAIN ISSUES REPORT AND ENVIRONMENTAL REPORT

The Aberdeen City and Shire Structure Plan was approved by Scottish Ministers in August 2009 and set out an ambitious vision for the future development of the area. We have started to review that document and a Main Issues Report has now been published. Although we think most of the structure plan is still fit for purpose, we have identified a number of areas where we might need to change it, including:

- sustainable economic growth (transport and digital infrastructure);
- facilitating development (financing new infrastructure and a strategic transport fund);
- resource efficiency (waste management infrastructure, carbon neutrality and water efficiency); and
- new proposals which support the plan's vision (carbon capture and storage, offshore electricity transmission and transport interventions).

An Environmental Report has also been published which identifies, describes and evaluates the likely significant effects on

the environment of the options presented in the Main Issues Report.

This is your main opportunity to influence the content of the new strategic development plan, before any decisions have been made.

The Main Issues Report, Environmental Report and associated documents are available from our website and on request from the address below. They are also available to consult at public libraries and planning offices throughout the area during normal opening times. You should send your response to the Main Issues Report (or the associated reports and assessments) to reach us by **6 January 2012** via our website, by email, letter or fax.

**Aberdeen City and Shire Strategic
Development Planning Authority,
Archibald Simpson House,
27 - 29 King Street, Aberdeen AB24 5AA,
tel: 01224 628210, fax: 01224 640517
team@aberdeencityandshire-sdpa.gov.uk
www.aberdeencityandshire-sdpa.gov.uk**

7 October 2011



Appendix 4 – Consultation event advert

ABERDEEN | Strategic Development
CITY AND SHIRE | Planning Authority

Aberdeen City and Shire Strategic Development Plan: Main Issues Report Consultation Events

The Aberdeen City and Shire Strategic Development Planning Authority (SDPA) published a Main Issues Report for consultation on 7 October 2011 - with a closing date for responses of **6 January 2012**. The Main Issues Report is a discussion document which, building on the current structure plan, sets out the strategic planning issues we face as we plan for the period up to 2035. The Main Issues Report and associated documents are available from the SDPA website, all public libraries and on request from the address below.

As part of this consultation a series of informal open sessions have been organised throughout the area. These will enable you to find out more about the strategic development plan and help you respond to the consultation. Details of the seven events are set out below:

Location	Date
Aberdeen – SDPA, 27-29 King Street	Thursday 8th December (3:30-7:30pm)
Banchory - Burnett Arms Hotel, High Street	Friday 9th December (3:30-7:30pm)
Peterhead – Palace Hotel, Prince Street	Monday 12th December (3:30-7:30pm)
Ellon – Buchan Hotel, Bridge Street	Wednesday 14th December (3:30-7:30pm)
Stonehaven – Belvedere Hotel, Evan Street	Thursday 15th December (3:30-7:30pm)
Inverurie – Kintore Arms Hotel, High Street	Monday 19th December (3:30-7:30pm)
Banff – Fife Lodge Hotel, Sandyhill Road	Tuesday 20th December (3:30-7:30pm)

Please feel free to drop in and find out more. If you are unable to make any of the above, please contact us and we will answer any questions you may have.

Aberdeen City and Shire Strategic Development Planning Authority,
Archibald Simpson House, 27 - 29 King Street, Aberdeen, AB24 5AA
Tel: 01224 628214

www.aberdeencityandshire-sdpa.gov.uk
team@aberdeencityandshire-sdpa.gov.uk



Appendix 5 – Close of consultation press release

Consultation on North-east future closes next week

Consultation on the future development of the Aberdeen City and Shire region closes next Friday (6 Jan 2012).

The views of citizens, businesses and community groups are being sought on a new Main Issues Report, which suggests updates to the Aberdeen City and Shire Structure Plan 2009 to address the difficult economic times and to respond to the challenges and opportunities of climate change.

Publication and consultation on the Main Issues Report is a key part of the process to replace the 2009 Structure Plan with a new Aberdeen City and Shire Strategic Development Plan to guide development up to 2035, which will be submitted to Scottish Ministers in 2013.

People have been submitting responses to the Main Issues Report since it was published in October, with more than 1,200 people accessing the Aberdeen City and Shire Strategic Development Planning Authority's website at www.aberdeencityandshire-sdpa.gov.uk since the start of the consultation.

The discussion document recognises the robust and resilient nature of the North-east economy over recent years and highlights the importance locally and nationally of supporting this. Transport and digital connectivity are pinpointed as critical to enhancing growth locally, as well as continuing to create opportunities for businesses and households to move to the area.

The consultation suggests that we continue to plan for high levels of growth and that the focus should remain on creating sustainable mixed communities.

The delivery of much-needed affordable housing has become more challenging over recent years - and the Main Issues Report identifies a growing need for such housing and the importance of creative solutions to ensure we meet as much of that need as possible within the significant financial constraints which exist.

Managing our resources more efficiently will also be vital over the next 20 years to both economic success and to tackling the environmental challenges we face.

We currently waste significant quantities of energy and water, while disposing of our waste in landfill sites is also damaging. Options for more sustainable energy use and for better waste management are set out in the Main Issues Report, with a recognition that changing the way we deal with our waste is particularly challenging.

Four proposals have been put forward in the consultation document for potential inclusion in the new Strategic Development Plan, with a capital value of several billion pounds, including carbon capture and storage, new electricity transmission infrastructure at Peterhead, and transport improvements in and around Aberdeen to cope with the level of growth anticipated over this period.

The Strategic Development Planning Authority, on behalf of both Aberdeen City and Aberdeenshire Councils, would like to encourage as many as possible to respond to the consultation, whether businesses, community groups or individuals.

More information, including the Main Issues Report, is available from the SDPA website ([Current Consultations](#)). Responses to the Main Issues Report can be made up to 6 January by email to team@aberdeencityandshire-sdpa.gov.uk, in writing to Aberdeen City and Shire Strategic Development Planning Authority, Archibald Simpson House, 27-29 King Street, Aberdeen AB24 5AA, or by fax on 01224 640517.

29 December 2011

Appendix 6 - Respondents

027	Aberdeen Airport
067	Aberdeen Cycle Forum
040	Aberdeen Football Club
074	Aberdeen Harbour Board
060	Aberdeenshire Environmental Forum - Waste Group
075	ACSEF
005	ACSEF Employment Land Working Group
062	Angus, Ms Jane
012	Barclay, Mrs Linda
044	Barratt East Scotland
014	Benton, Mr Gordon
076	Boggia, Mr William
063	Boulton, Cllr Marie
080*	Burgess, Ms Christine
024	Burnshangie Developments Ltd
025	CALA Homes (East) Limited
013	Carnegie Base Services
022*	Castleglen Properties (Aberdeen) Ltd
066	Caterline, Kineff and Dunnottar Community Council
052	Chalmers, Mr David
077*	Culter Community Council
068	Cults, Bieldside and Milltimber Community Council
036	Deveron Homes Ltd
035	Deveron Homes Ltd / Aberdeenshire Housing Partnership
004	Downie, Mr Brian
048	Dunecht Estates
073	Edinmore Properties Ltd
038	Elsick Development Company Limited
023	Fraser, Mr John
084*	Geddes, T
039	Grandhome Trust
065	Homes for Scotland
032	Hurry, Mrs May
029	Hutcheon, Mrs Nicola
049	Ingram, Mr Gordon
045	Inverurie Community Council
006	John Lewis plc
011	Kempe, Mr Clive
015*	Kincluny Trust
008	Kirkenergy Ltd
064	Maltin, Ms Charlotte
042	Massie, S
028	McKibben, Mr Byron
018	Melville, K
056	Morgan, Mr Dewi
010	Morris, Dr Richard

057	Mssrs McIntosh
016	Mutch, Mr Gordon
020	Mutch, Ms Shona
070	National Grid
081*	Nestrans
021	Network Rail
002	Newmachar Community Council
059	Newtonhill, Muchalls & Cammachmore Community Council
053	NorthConnect KS
009	North East Mountain Trust
085*	North Kincardine Rural Community Council
078*	Oil & Gas UK
079*	Old Aberdeen Community Council
017	Oldmeldrum, Bourtie & Daviot Community Council
030	Patterson, Mr Frank
061	Portlethen & District Community Council
046	Sandlaw Farming Company Ltd
043	Scotia Homes Ltd
007	Scottish Enterprise
031	Scottish Environment Protection Agency
051	Scottish Government
055	Scottish Hydro Electric Transmission Ltd
082*	Scottish Natural Heritage
019*	Scottish Property Federation
069	Scottish Retail Property Limited Partnership
050	Scottish Water
033	Shell (UK) Limited
041	SITA UK
054	SSE Generation Ltd
072	Stewart Milne Homes
037	Tactran
003	Tait, Cllr Ian
083*	Taylor, Mr T
058	Taylor Wimpey
001	TAYplan SDPA
034	The Greenspan Agency
071	Union Square Developments Ltd
047	Westhill Developments (Arnhall) Ltd
026	Wilson, Miss E

* – Late Responses

Appendix 7 – Response Summaries

Respondents

The tables below list the respondents to the MIR consultation by reference number as well as in alphabetical order for ease of reference. Reference numbers correspond to the summarised comments contained in the following pages.

Comments have been summarised and grouped if appropriate, the purpose being to give a broad overview of the comments received in response to consultation. When moving towards a response to the comments received it will be the full response which is used rather than the summary.

001	TAYplan SDPA	027	Aberdeen Airport
002	Newmachar Community Council	067	Aberdeen Cycle Forum
003	Cllr Ian Tait	040	Aberdeen Football Club
004	Mr Brian Downie	074	Aberdeen Harbour Board
005	ACSEF Employment Land Working Group	060	Aberdeenshire Environmental Forum - Waste Group
006	John Lewis plc	075	ACSEF
007	Scottish Enterprise	005	ACSEF Employment Land Working Group
008	Kirkenergy Ltd	062	Angus, Ms Jane
009	North East Mountain Trust	012	Barclay, Mrs Linda
010	Dr Richard Morris	044	Barratt East Scotland
011	Mr Clive Kempe	014	Benton, Mr Gordon
012	Mrs Linda Barclay	076	Boggia, Mr William
013	Carnegie Base Services	063	Boulton, Cllr Marie
014	Mr Gordon Benton	080	Burgess, Ms Christine
015	Kinclunly Trust	024	Burnshangie Developments Ltd
016	Mr Gordon Mutch	025	CALA Homes (East) Limited
017	Oldmeldrum, Bourtie & Daviot Community Council	013	Carnegie Base Services
018	K Melville	022	Castleglen Properties (Aberdeen) Ltd
019	Scottish Property Federation	066	Caterline, Kineff and Dunnottar Community Council
020	Ms Shona Mutch	052	Chalmers, Mr David
021	Network Rail	077	Culter Community Council
022	Castleglen Properties (Aberdeen) Ltd	068	Cults, Bieldside and Milltimber Community Council
023	Mr John Fraser	036	Deveron Homes Ltd
024	Burnshangie Developments Ltd	035	Deveron Homes Ltd / Aberdeenshire Housing Partnership
025	CALA Homes (East) Limited	004	Downie, Mr Brian
026	Miss E Wilson	048	Dunecht Estates
027	Aberdeen Airport	073	Edinmore Properties Ltd
028	Mr Byron McKibben	038	Elsick Development Company Limited
029	Mrs Nicola Hutcheon	023	Fraser, Mr John
030	Mr Frank Patterson	084	Geddes, Ms T
031	Scottish Environment Protection Agency	039	Grandhome Trust
032	Mrs May Hurry	034	Greenspan Agency
033	Shell (UK) Limited	065	Homes for Scotland
034	The Greenspan Agency	032	Hurry, Mrs May
035	Deveron Homes Ltd / Aberdeenshire Housing Partnership	029	Hutcheon, Mrs Nicola
036	Deveron Homes Ltd	049	Ingram, Mr Gordon
037	Tactran	045	Inverurie Community Council
038	Elsick Development Company Limited	006	John Lewis plc
039	Grandhome Trust	011	Kempe, Mr Clive
040	Aberdeen Football Club	015	Kinclunly Trust
041	SITA UK	008	Kirkenergy Ltd
042	S Massie	064	Maltin, Ms Charlotte
043	Scotia Homes Ltd	042	Massie, S
044	Barratt East Scotland	028	McKibben, Mr Byron
045	Inverurie Community Council	018	Melville, K
046	Sandlaw Farming Company Ltd	056	Morgan, Mr Dewi
047	Westhill Developments (Arnhall) Ltd	010	Morris, Dr Richard
048	Dunecht Estates	057	Mssrs McIntosh
049	Mr Gordon Ingram	016	Mutch, Mr Gordon
050	Scottish Water	020	Mutch, Ms Shona
051	Scottish Government	070	National Grid
052	Mr David Chalmers	081	Nestrans
053	NorthConnect KS	021	Network Rail
054	SSE Generation Ltd	002	Newmachar Community Council
055	Scottish Hydro Electric Transmission Ltd	059	Newtonhill, Muchalls & Cammachmore Community Council

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056	Mr Dewi Morgan	009	North East Mountain Trust
057	Mssrs McIntosh	053	NorthConnect KS
058	Taylor Wimpey	084	North Kincardine Rural Community Council
059	Newtonhill, Muchalls & Cammachmore Community Council	078	Oil & Gas UK
060	Aberdeenshire Environmental Forum - Waste Group	079	Old Aberdeen Community Council
061	Portlethen & District Community Council	017	Oldmeldrum, Bourtie & Daviot Community Council
062	Ms Jane Angus	030	Patterson, Mr Frank
063	Cllr Marie Boulton	061	Portlethen & District Community Council
064	Ms Charlotte Maltin	046	Sandlaw Farming Company Ltd
065	Homes for Scotland	043	Scotia Homes Ltd
066	Caterline, Kineff and Dunnottar Community Council	007	Scottish Enterprise
067	Aberdeen Cycle Forum	031	Scottish Environment Protection Agency
068	Cults, Bieldside and Milltimber Community Council	051	Scottish Government
069	Scottish Retail Property Limited Partnership	055	Scottish Hydro Electric Transmission Ltd
070	National Grid	082	Scottish Natural Heritage
071	Union Square Developments Ltd	019	Scottish Property Federation
072	Stewart Milne Homes	069	Scottish Retail Property Limited Partnership
073	Edinmore Properties Ltd	050	Scottish Water
074	Aberdeen Harbour Board	033	Shell (UK) Limited
075	ACSEF	041	SITA UK
076	Mr William Boggia	054	SSE Generation Ltd
077	Culter Community Council	072	Stewart Milne Homes
078	Oil & Gas UK	037	Tactran
079	Old Aberdeen Community Council	003	Tait, Cllr Ian
080	Ms Christine Burgess	083	Taylor, Mr T
081	Nestrans	058	Taylor Wimpey
082	Scottish Natural Heritage	001	TAYplan SDPA
083	Mr J Taylor	071	Union Square Developments Ltd
084	Ms T Geddes	047	Westhill Developments (Arnhall) Ltd
085	North Kincardine Rural Community Council	026	Wilson, Miss E

1 – Introduction and general comments

10 – The term ‘sustainable development’ is a slippery concept. Growth and development are not the same thing. While many topics covered are important to sustainability, the document also focuses on growth. Would like to see the north east considering a transition to more steady-state economics or at least a broader recognition of other aspects of quality of life.

14 – There is little evidence of the prosperity of the area in civic terms, with no buildings of architectural distinction over the last 30 years and no transition to a modern city. We need to look to the private sector for a large part of the investment needed.

16, 20 – Only individuals and democratically elected bodies should have been involved in preparing the MIR, not a self-appointed quango like ACSEF.

17 – The MIR was very clear and easy to read.

18 – I agree with most if not all the content of the Main Issues Report and congratulate the team on a clear and well thought out report.

18 – The local community’s views have in the past been over-ridden by the Scottish Office, particularly at appeal. Too often the Scottish Office and on occasion the local authorities have been developer-led, and hope that this will no longer be the case with local communities having a greater say in where development should and should not take place.

19 – Why is the SDP being produced after the LDPs when government policy directs the other way round?

25 – Online form was difficult to use.

31 – The MIR is of a high standard, providing a clear direction and setting out well the key issues for the area.

45 – The MIR is predicated on the wider planning framework operated by national and local government and therefore misses many issues communities would like to see addressed. Questions are directed in such a way as to make town specific attitudes difficult to properly express. We wish to work with a system which we ultimately believe is not able to help.

49 – The MIR did not send me to sleep and held my interest throughout, although elements were repetitive.

50 – Scottish Water support the plan and will continue to work with the SDP team.

51 – We commend the SDPA on a very well-drafted MIR which was a pleasure to read. Its format and clarity is welcomed.

56 – Lack of detailed references (e.g. Q13).

59 – The MIR is clear and well written but it was necessary to read it in conjunction with other documents such as the structure plan and regional transport strategy.

59 – The consultation did not adhere to the principles of the National Standards for Community Engagement because the deadline did not take into account the voluntary nature, limited resources and meeting schedules of Community Councils.

59 – The road-show event was extremely useful.

63 – Do not agree that the changes required are limited as the fundamentals of the plan, housing numbers, economic climate etc all demand attention. The full impact and length of the recession is a major factor.

65 – The proposed plan should not be published until the two LDPs have been adopted.

77 – Concern over the state of the economy and the effect of this on the current plan and its implementation. Is forward planning over 25 years reasonable in such circumstances? The plan needs to be flexible to allow development as the recovery takes place.

81 – Nestrans will be undertaking a refresh of the Regional Transport Strategy in 2012 and will that it is fully aligned with the emerging SDP.

85 – Broadly agree that the Structure Plan (2009) should form the basis for the new strategic development plan.

2 – Major influences on the strategic development plan (Q1)

Q1 Do you agree that supporting development in challenging economic times and responding to the challenges and opportunities of climate change should be the main factors which influence the content of this main issues report? Are there others?

6, 7, 8, 9, 15, 17, 19, 34, 38, 39, 40, 43, 44, 57, 65, 72, 74, 75, 77 – Agree that these are two main issues which should influence the development plan.

7 – This needs to be seen in the context of the Scottish Government's commitment to sustainable economic growth and the importance of Energetica in helping to deliver the vision.

8 – The conservation and efficient utilisation of finite resources should be the third influence of equal importance.

9 – The plan also needs to cover the conservation of our high quality environment – such as green belt, coastline and moorland.

9 – Should work to slow the decline in the oil industry be addressed explicitly?

10 – While responding to climate change is essential, there are wider issues of sustainability such as the maintenance and enhancement of ecosystem services.

11 – These need not be challenging economic times in Aberdeen, the problems are caused by mismanagement and waste of resources.

11 – Climate change and local environmental issues should be the top priority but are being systematically ignored by unsustainable planning (urban sprawl and dereliction).

15 – The delivery of development remains key and the timely delivery of the AWPR. Costs appear to be constantly added to development so all but the largest schemes will not go ahead.

16, 20 – In harsh economic times, less ambitious plans and better use of finite resources is a more realistic goal.

19 – Increasing irritation at a perception that the North East is protected from the wider forces at work in the world which is not the case.

19 – Need to build on existing scientific reputation by sustaining and growing important business and employment locations.

29, 68 – Para 1.6 suggests limited changes but a lot has changed since the foundations of the structure plan were set. The plan already looked very aspirational in 2008 and the state of the economy looks significantly worse now. The opportunity should be taken to look at an alternative scenario.

29 – Sites viable in the short-term need to be emphasised, small high-value sites with low risk.

29 – Development should not be supported for its own sake but only when it brings sustainability benefits, in accordance with s44 of the Climate Change (Scotland) Act 2009. The main factors identified do not meet the requirements of the Climate Change Act or the statutory requirement to contribute to sustainable development. The first factor should be about supporting sustainably located development.

30 – Sustainable development and peak oil are the two key issues and the 3rd Don Crossing runs counter to both.

30 – There is a disconnect between the two issues identified and the rest of the document.

31 – Agree that climate change is a key issue and opportunity, with development plans having a crucial role to play.

32 – This was a wasted opportunity to reject the blatant dishonesty of man-made climate change and stand up for the rights of the people of Aberdeenshire against the damage which will be caused by this ideological fantasy and the wind turbines it will bring with it, causing incalculable damage to the economy and environment.

34 – It is noted that the main influences are in accordance with the require development plans with the aim of contributing to sustainable development (s3E(2) of the Planning Act).

22, 36, 58 – Agree that the SDP should support development and with it the economic growth of the region, with support for new house building being paramount.

43 – The SDP should place more emphasis on achieving reductions in carbon use through greater insistence on mixed use development (for all residential and almost all commercial development) and reducing reliance on vehicular transport.

43 – The SDP should place more emphasis on achieving high quality sustainable design and places.

44 – Support for development is critical if the SDPA wants to deliver the aim of economic growth. A lot of positive statements in the MIR which need to be built upon in the proposed plan.

44, 57 – It is important that the strategy is clear and does not contradict itself, giving with one hand but taking with the other. Additional costs appear to be constantly added to developers.

45, 61 – Do not feel that the planning system and public bodies should be “supporting development”.

45 – The promotion of the local economy by local interests would sit better with communities, rather than ‘supporting development’.

46, 47, 48 – Given the current economic climate, it is essential the SDP should be supporting development but there is little evidence of this in the MIR.

46, 47, 48 – Climate change is a secondary consideration which can be dealt with by other regulatory means. The SDP should focus on land use and the promotion of development.

49 – Market forces will determine development. The Scottish and Westminster Governments must support the area unlike in the past. Too many unaccountable bodies with their own agendas.

51 – Scotland’s Cities: Delivering for Scotland, the Infrastructure Investment Plan and Regeneration Strategy have all been published by the Scottish Government since the MIR and should be taken into account in the proposed plan, as should the Land Use Strategy and National Planning Framework 2.

57 – Failure of the AWPR to proceed should be actively considered and a potential response outlined.

59 – The development plan has a view to 2030 and should not concentrate on the negative aspects of the last few years.

64 – In addition to these, development must be sustainable, compliant with UK and EU Directives, and protect the area’s heritage. Food security is critical and development should not take place on productive land, with a focus on brownfield sites and clusters of houses rather than sprawling expansions.

65 – There are elements of the MIR which create rather than reduce burdens on the development industry and the SDPA must not contradict its own aims.

65 – The SDP must build on the positive messages in the MIR by providing specific policy direction.

66 – A commitment to development and investment are paramount, within the constraints of economic sustainability, but short-termism should be avoided as land is an irreplaceable resource which should not be sacrificed for short-term gain.

68 – The first influence is too narrowly defined, it should be about the integration and delivery of resources that balances maintenance of historic and cultural heritage, generates sustainable economic development, promotes a high quality of life and protects the environment. The second influence is broadly supported.

69 – Supporting development is the main factor. Prioritising the city and town centres for retail development by continuing the provisions of established retail policy.

71 – It is important that the plan supports development and economic activity. The SDP should seek to encourage investment and job creation, ensuring there are no unnecessary obstacles.

72 – Welcome the focus on supporting development but this should not just be in times of economic challenge.

72 – The SDP should fully consider retail and leisure issues, while promoting the need to deliver an effective supply of housing land.

72 – The SDP must set out all the key economic drivers and offer clear guidance to the LDPs.

73 – Paras 1.6 and 4.3 suggest that the number of changes to the current structure plan are likely to be limited but much has changed since 2006/07. SPP, NPF2, Planning etc (Scotland) Act 2006 and a focus on sustainable economic growth and delivery. This suggests more fundamental change.

73 – “Challenging economic times” requires definition as the inability of the banking sector to lend to the development industry to pay for infrastructure. As a consequence, the development plan must take an infrastructure led approach.

78 – A holistic approach to sustainable development is essential to consider the economic, social and environmental development of the area. Aberdeen cannot

afford to be perceived as unattractive in terms of social amenities and ease of doing business if we are to attract talent to fill the skills shortages. Competitors are Dubai rather than Dundee and Singapore rather than Stirling.

79 – Less ambitious plans would be more appropriate and better management of the region's resources the priority.

82 – Supporting sustainable development should be the main factor. Affordability is not a good reason to defer costs (financial or environmental) to future generations.

3 – Format (Q2)

Q2 Are there any other changes to the format or presentation of the current structure plan which would make it easier to read or use?

7, 75 – The changes proposed are appropriate.

8, 9, 15, 16, 20, 17, 46, 47, 48, 56, 72, 77, 79 – The current structure plan is generally acceptable in the existing format and style.

15 – The mapping and definition could be considerably improved so as to make deliverable projects even more deliverable. Schedule 1 works well but the Key Diagram is a concern because it is precise in the City and diagrammatic in Aberdeenshire, while the AWPR has been ignored and the text is potentially contradictory.

29 – A fundamental change to the plan will result in a fundamental change to the format and presentation of the plan.

30 – Links to key supporting material would be useful, highlighting unjustifiable projects like the 3rd Don Crossing.

36 – The maps could be bigger which would make them clearer and show more information.

38, 39 – It is assumed that the vision should take priority over the aims, policy, objectives and targets when determining planning applications.

38, 39, 40 – Not sure that moving the proposals goes far enough in clarifying their status.

40 – The current format of the structure plan is easy to read but has a complex structure of aims, targets etc.

45 – At a disadvantage in having strategic as well as local development plans, benefits are unclear to having a wish list with no coherent implementation mechanism.

46, 47, 48 – Unfortunately, the brevity of the structure plan has been countered by the length of the LDPs and Supplementary Guidance (particularly in Aberdeenshire) with the result that the new development plan will be as (of not more) cumbersome than the old one.

49 – No matter how many awards are won, the objective is to bring continued growth to the area...not to please the Scottish Government. Need to clarify grey areas such as who is responsible for actions.

51 – SDPs should be concise visionary documents that set clear parameters for LDPs and inform decisions about strategic infrastructure investment. The current structure plan is an excellent starting point in terms of length and readability.

59 – The equal width columns of the MIR are easier to read than the structure plan 2:1 split and some of the graphics are clearer. Fewer photographs would be helpful.

65 – The current plan is clear, concise and easy to use.

65, 72 – We have concerns over the lack of policies and a few well defined policies would provide clear guidance to the LDPs and certainty to stakeholders.

68 – Welcome more illustrative material but also suggest an action plan and a case study of traffic congestion in the south of the city.

73 – The principle of providing more information on proposals (para 3.3) is supported.

73 – The corridor approach does not provide the level of certainty to potential developers required by SPP and is unacceptable. The plan must identify locations rather than search areas.

82 – The structure plan key diagram is rather busy, particularly around Aberdeen. Reproduction at a larger scale would improve clarity.

4 – Vision and spatial strategy (Q3)

Q3 Do you agree that the vision and spatial strategy of the current structure plan are still appropriate to use in the strategic development plan?

6, 7, 8, 9, 13, 15, 17, 19, 22, 31, 35, 36, 38, 39, 44, 57, 58, 61, 65, 69, 71, 72, 75, 77, 81 – Agree that the current vision and spatial strategy are appropriate for the strategic development plan.

10 – While responding to climate change is essential, there are wider issues of sustainability such as the maintenance and enhancement of ecosystem services.

11 – No.

13 – The challenge at present is delivery so it is expedient to continue with the existing strategy.

16, 20 – The vision is OK but the priorities are wrong. Quality of life and the environment should be at the top of the list. Aberdeen can remain and develop as a world energy city even with the decline in North Sea extraction as long as it remains a desirable place to live. Urban sprawl and building on the greenbelt will not make Aberdeen prosper in the long-term.

19 – Particularly support Energetica, science parks and development around the airport.

19 – The councils should have a flexible attitude to consider proposals on their own merits.

37 – We support the prominence given to the RTS and RTP in supporting the delivery of the SDP vision, objectives and associated delivery actions throughout the document.

44, 65 – The Reporters conclusions at the LDP examinations may need to be factored in.

49 – No. There needs to be a sea-link along the coast and improved road and rail links.

66 – Unanimously back the thrust of the strategic development plan.

Vision

8 – The “confident and courageous” vision was not transferred to the two LDPs in relation to resource management, potentially because the structure plan was lacking in this respect. It is positive that the strategic development plan will be more detailed.

11 – Far removed from the specifics in the plan such as road building.

17 – The vision could be more focused.

29 – Wording is too woolly. The phrase “progressively become” should be used rather than an end date and “continuously improving” in relation to the things the area will be recognised for. A commitment to sustainability of location and design is required.

30 – Largely agree with the vision but there is a disconnect with the proposals such as the 3rd Don Crossing.

43, 56, 63 – It may be appropriate to carry the vision forward.

46, 47, 48 – The existing vision is laudable but is diluted if the target date is simply put back every five years. A further aspiration should be set beyond 2030.

54 – On the whole support the vision but suggest adding “and supporting appropriate renewable energy development” after “climate change”.

55 – The vision is supported due to its recognition of the requirement to address the impacts of climate change.

59 – The current vision is fatally flawed. Nothing stays the same and neither should the vision.

69 – Suggest adding “we will be recognised for our thriving, attractive and dynamic city centre”.

73 – The aim to provide a more sustainable and inclusive society is supported but does not find expression in the rest of the document.

79 – OK but more priority should be given to protecting and promoting the environment and quality of life. “Work” should be added to the list.

80 – The vision is badly written and therefore loses its impact.

“By 2035 Aberdeen City and Shire will have grown to be a considerably more attractive and prosperous European city region, one that has sustainability at its heart and one that continues to be an outstanding place to live and work, visit and grow business.

We will be widely recognised for our keen enterprise and creativity, for our resolute commitment to the environment and for our staunch support to our communities.

We will have taken bold action

- to ensure our economy continues to thrive and remains robust and resilient
- to embrace the challenge of climate change and pioneer cutting edge sustainable development
- to protect and enhance the outstanding quality of our environment and our high quality of life
- to create strong, flourishing and inclusive communities”

82 – The vision is still appropriate but could be made more specific to Aberdeen City and Shire.

Spatial strategy

1 – Support for the current spatial strategy and the recognition it gives to the relationship between the southern Aberdeenshire towns and the Angus towns.

2 – Concern that Newmachar is not receiving an adequate level of support because it is in a local growth and diversification area and yet receiving a significant level of growth.

3, 83, 84 – It is absolutely essential that Fraserburgh should be included within the strategic growth area extending north from Aberdeen, currently as far as Peterhead to allow maximum development and regeneration to be achieved to revive Fraserburgh’s economy.

3 – Regeneration priority area status makes no difference to Fraserburgh in helping it get back on its feet.

13 – There are development opportunities to the south of the Drumlithie to Laurencekirk corridor and the corridor needs to be extended south to Newesk to include the development area at the brownfield site of the former Edzell Air Base. This site could become a highly desirable and sustainable mixed community and help meet pressing housing and employment land needs.

15 – A slight relaxation of the SGA definition would allow for a Plan B, which should include the Kincluney Trust scheme at Park which is unrivalled as a sustainability project but the definition of SGAs make it easy to dismiss. This is a planning injustice.

19 – An over-emphasis on brownfield development could hinder implementation of the strategy.

19 – Generally agree with the large-scale Greenfield land releases but the SDP should encourage a flexible approach to small unallocated sites coming forward.

22 – The expansion of Potterton is key to delivering the strategy in the Aberdeen to Peterhead corridor.

29 – The process of preparing the LDPs has thrown up issues. There should be a greater focus of new development on Aberdeen for sustainability reasons. Outlying SGAs should just focus on locations with stations. The 25% allocations to local growth areas is far too high and should be redirected into Aberdeen.

30 – The strategy demonstrates an inability to decouple from unsustainable car transport.

34 – Renewable energy projects can play an important role in the diversification and regeneration of the rural economy, concerned that this is not referenced.

36 – Stonehaven requires more development and is a sustainable location. The site at Braehead Farm is the natural extension to the town.

37 – Support the spatial strategy and priority given to focusing economic growth and development on key strategic growth corridors.

38, 39, 40 – It is imperative that the spatial strategy remains as landowners and developers have invested in it on the back of the structure plan.

42 – Developing the corridors is only acceptable if it is integrated into the surrounding areas and that these areas are not forgotten about.

43 – Concerned about the deliverability of the spatial strategy in the current economic climate and consider that additional flexibility to allow other sites to come forward. Large sites will be hard to deliver due to the amount of cost and

infrastructure required – modest expansion of existing communities is more appropriate.

44, 47, 48, 65 – Further consideration needs to be given to the extent of the SGA, particularly around Westhill, expanding on recent successful expansion and clear demand. It has performed a strategic role in the past and should do again. Past employment land take-up rates are considered to justify the inclusion of Westhill in a SGA, as do making efficient use of the transport network and reducing the need to travel.

45 – Understandable logic to future development being concentrated in areas of previous development but proposals to develop elsewhere should be assessed on their merits, not with reference to a plan which failed to see such an opportunity.

46, 47, 48 – The spatial strategy remains generally appropriate but should not be slavishly adhered to. The SDP should continue to make provision for the growth of successful communities such as Banchory and Westhill.

47, 48 – The AWPR is the key link to all the SGAs and there will be a major junction close to Westhill. The AWPR and Westhill should therefore be identified as falling within a SGA and benefit from specific housing and employment allocations.

51 – Given that the existing strategy was well appraised in transport terms, it is unlikely that significant additional work will be required if the strategy is retained.

57 – The strategy needs to be flexible enough to cope with the non-delivery of the AWPR and the 'North of the Don Masterplan' provides this.

59 – Housing development should not be allowed to clog up the vital transport arteries.

64 – The Aberdeen-Huntly corridor should include Kemnay and focus more on Huntly with less on Inverurie. Improved rail services to support this.

65, 72 – The balance between the two HMAs needs to be shifted towards the AHMA in places such as Westhill.

68 – More emphasis on regeneration priority areas and developing towns in Aberdeenshire.

69 – Would like to see Aberdeen City Centre specifically identified on the strategy map given its economic and cultural importance to the city region.

72 – More guidance is required on the general location of development as the non-prescriptive nature of the structure plan left too much for the LDPs to consider.

72 – Concerns regarding the level of brownfield development being anticipated in Aberdeen City. There should be a mechanism which allows an increase in greenfield allocations should brownfield fail to deliver.

73 – Development in the north of the Aberdeen-Stonehaven corridor (such as land between Ardoe and Maryculter) is inherently more sustainable than further south. It should be included within the strategic growth area.

73 – A “core development area” approach would be better, such as that in the Edinburgh and Lothian Structure Plan.

73 – It is inappropriate to base a strategy on the delivery of a project subject to legal challenge such as the AWPR. Sites not dependent need to be identified such as land between Ardoe and Maryculter which would mitigate congestion at the Bridge of Dee.

82 – A green network should form part of the spatial strategy, contributing towards the high quality of life of the vision through the provision of habitat, recreational and active travel opportunities.

5 – Sustainable economic growth (Q4 - 9) inc Appendix 5

6 – Agree with para 5.6 that “*[i]t is critical that we make the most of these opportunities, with growth supported by the planning system and by providing important.*” A pro-growth approach will be attractive to potential investors and developers and in turn boost the vitality and viability of the city centre.

6 – Important that the pro-growth approach does not lead to the ‘knee-jerk’ development of quick and easy proposals. Support should be for proposals which contribute to the economic, social and environmental wellbeing of the area.

11 – Planning needs to be tightened. Proper high density housing (above shops etc) would alleviate housing shortages and build proper communities.

11 – Who close inner city schools (para 5.15) as this is the sort of area that should be re-built. Now is the time to make radical changes to the housing stock, expensive programmes will be more difficult to implement post-oil when the city is in danger of becoming a slum.

37 – We agree with para 5.28 regarding the prospects for High Speed Rail. STPR proposals to improve the rail network and infrastructure north of the Central Belt (especially Projects 6 and 23) need to be implemented as a compliment to and ideally in advance of HSR to ensure regional economies are able to benefit from it. Journey-time reductions need to be achieved by infrastructure improvements rather than service reductions.

37 – In line with NPF2, it is important that existing direct rail connections to Newcastle and London are maintained (both before and after HSR) to enable east coast connectivity.

43 – Para 5.9 states that “successful, sustainable mixed communities will continue to be our priority” and this is supported.

45 – Difficulties with the concept of sustainable growth. More of the same housing in an area with no reasonable prospect of a comparable number of new jobs will simply lead to unsustainable commuting and will not help us out of our current hole.

54 – Welcome the reference in para 5.13 that helping to provide renewable energy as well as its infrastructure builds on the area's current strengths as well as bringing economic benefits.

54 – Recommend that the Scottish Government's 2020 Route Map for Renewable Energy Development should be taken into account in preparing the SDP.

Q4 Do you agree that the current structure plan supports sustainable economic growth in Aberdeen City and Shire and is ambitious in its vision?

7, 9, 15, 19, 22, 35, 36, 44, 57, 61, 65, 66, 75, 77 – Yes

11, 30 - No

8 – Not in relation to waste management, as evidenced by the changes proposed in the MIR.

10 – While responding to climate change is essential, there are wider issues of sustainability such as the maintenance and enhancement of ecosystem services.

15 – Important that the LDPs implement this vision at the required rate.

16, 20 – The housing provision is too high.

17 – Very ambitious and quite optimistic given reliance on oil where production is in decline and jobs and workers will leave in large numbers. A lot of work will need to be done to replace them.

29 – Need to define 'sustainable mixed communities' (para 5.9). Development needs to be redirected to more sustainable locations (Aberdeen City) which reduce the growth in car travel identified in the Cumulative Transport Assessment.

35, 36 – High quality development is supported at all levels of the planning hierarchy. The plan is correct that economic growth is dependent on a range of inter-relating factors including land being available and services / facilities provided as these are critical to place-making.

35, 36 – The current plan's strategy for growth has proved successful.

38, 39 – Fully support the ambitions of the plan and have been working with the councils on delivery.

43 – There has not been a significant shift in attitude from the wider development industry sufficient to ensure that sustainable mixed use development is the default as required by the structure plan. The industry would still prefer the suburbanisation of greenfield sites.

43 – We agree (para 5.9) that it is too early to determine whether the focus on quality sustainable design will be successful and this is a further justification for adding flexibility into the strategy.

43 – The existing structure plan set ambitious targets for housing growth but there is little evidence to suggest that delivery in the form envisaged is happening – other than some public engagement and planning consents.

44 – What is the public sector going to do to prevent unnecessary delay in dealing with planning applications and building warrants?

44, 57 – It is important that the LDPs reflect and implement this vision which may need more detailed guidance.

45 – No, it further supports an economy based on using up resources.

46, 47, 48 – To a limited extent. Greater use should be made of existing infrastructure capacity.

49 – The spending history of the area means there are doubts about a joined-up agenda. No just return from Edinburgh and London to the area. With money something could be achieved but officials too content on not upsetting the status quo.

59 – No, it is stuck in the past and is not working. We need to attract and retain new businesses so we need to demonstrate the correct vision, including the right land for business and industry as well as good communications and a workforce who want to live here. The strategic growth areas need to be away from the main arterial routes but have good links to them.

64 – Lacks sufficient support for food production and proposals are likely to impact on quality of life.

65 – Prefer more detail and guidance for the local authorities to ensure both LDPs support the SDP and economic growth.

65 – The MIR does not state how the public sector can support development to ensure proposals are fast-tracked through the planning and building control systems so as not to delay the implementation of the plan.

65, 72 – There are risks in relying on large brownfield sites in the current financial climate. The SDP could put its strategic targets at risk if it does not recognise that brownfield sites may not deliver the numbers currently forecast. The balance should be shifted towards greenfield sites.

72 – Caution against the over-allocation in secondary and tertiary areas on the periphery of the strategic growth areas. In line with NPF2 and SPP allocations must be delivered within the lifetime of the plan.

77 – The timescale for achieving it will take much longer.

78 – Many of the proposals of the current structure plan are priorities. Aberdeen must be better connected to realise its potential.

79 – Questionable but possibly overly ambitious.

82 – Much of what is referred to as sustainable development is actually sustained development and is not sustainable. This failure to understand sustainable development needs to be addressed by the plan.

Q5 Do you agree that we should update the housing requirement to reflect the findings of the housing need and demand assessment and that the current allowances are enough to meet the need for new housing in the period until 2035?

9, 11, 15, 22, 29, 30, 43, 57, 61, 77 – Yes

11 – In sustainable areas such as close to future railway stations and on brownfield sites. Restrictions on housing height should be removed from the norm of 1½ to 3 or 4 stories.

15 – Given that the GRO figures are higher than those in the structure plan the requirement and allowances should remain at least as high. The current economic conditions should not deter the plan from being ambitious.

16, 20 – A reality check is needed on housing provision. Developers can't sell houses and many sites are in a neglected state. The supply of land (para 5.38) is too generous.

17 – It is hard to believe that population increases will continue at current levels into the future.

19 – Allocating sufficient land for housing is important to support a functioning economy. The region has a pressured housing market and should be doing all it can to meet this demand in full.

25 – A roll-forward makes sense in the current circumstances but conditions might improve over time and Homes for Scotland is best placed to monitor that. We need to work together.

25 – Allocations look adequate but we need to continue with longer-term phased sites so their potential is achieved and not lose sight of the vision for growth.

29 – Allowances need to be redistributed.

35, 36 – The requirement needs to be updated and additional land identified to take account of increasing demand, with releases in the right locations to respond to locational need.

38, 39 – The SDP should make it clear that it is the requirement in the plan against which the five year supply will be measured and not Schedule 1.

38, 39 – Concerned that the reduction in requirement is not linked specifically to the regeneration areas in the City. It is surprising that the requirement to 2035 is lower than the structure plan requirement to 2030.

38, 39 – The housing allowances have been reduced, whereas it would have been expected that these would have been increased (the 2017-2026 allowance is less than the requirement), suggesting a change in strategy as the current plan contains a 25% flexibility above the requirement.

38, 39 – The relationship between Figure 6 and Schedule 1 needs to be better explained to ensure the effective supply in the AHMA is met in accordance with the proportions envisaged in the plan.

38, 39 – It is important for the SDP to confirm whether it is envisaged that all the units identified in Schedule 1 are to be built within the defined periods.

38 - Would wish to see an increase in the units allocated to the Portlethen – Stonehaven corridor. The Aberdeenshire proposed LDP identifies Chapelton of Elsick for 4,045 to 2023. The development framework identifies the potential for an additional 4,000 homes beyond 2023.

42 – Under previous plans large settlements have mushroomed and small ones have been ignored. Small communities are on the endangered list and 10-20 new homes can make all the difference and enhance quality of life.

44 – The 2011 HNDA is the logical tool to accurately define need and demand. Links to the two local housing strategies are vital to ensure cohesive delivery.

44, 65 – The number of housing units should be increased. The target is 2,500pa but Fig 6 averages 2,159pa. It is critical that sufficient numbers are planned for.

45 – New and better housing is needed, but not in isolation from jobs.

46, 48 – Agree that the housing requirement should be updated to reflect the HNDA.

46, 48 - Do not accept that the allowances are enough to meet the need for new housing in the period to 2035. It is short-sighted to rely on the flexibility build into the current plan, especially when the Government's projections are higher. Such an approach cannot be considered as a strategy for growth. The allowances should be increased.

49 – Should be readily available.

56 – Allowances are more than enough. Concerned that they are extrapolations rather than based on analysis of business requirements. The need for thousands of new houses is puzzling when the employee requirements do not appear to be expanding at the same rate.

57 – The current economic conditions should not deter the plan from being ambitious in its vision.

57 – The housing requirement and allowances should remain at least as high as the existing ones.

59 – Development should be driven by the need for places to live, not to keep house builders employed.

64 – No, recession and the return of EU workers means it would be inappropriate to update the requirements.

65, 72 – It should be made clear that sites are required to deliver units within a plan period rather than just allocations. Deliverability is key and sites using existing or improved infrastructure should be considered before new settlements.

44, 65, 72 – Careful consideration needs to be given to the balance between the two HMAs and it is vital to allocate a higher percentage of sites within the AHMA.

65, 72 – The SDP must use the most up-to-date information available. Disappointed that the HNDA chose not to use the 2008 GRO projections.

66 – Regular monitoring and assessment of housing needs is essential although the current projections are adequate.

68 – Continue to question the scale of housing development which is too high. Where site capacities are reduced they should not be replaced by additional sites.

72 – Evidence suggests that the housing requirement should be increased across the period to 2035. 72,000 homes seemed ambitious at the time but now appears conservative. In excess of 100,000 homes should be provided for.

73 – There are no serious environmental or infrastructure constraints (SPP) yet the planning authority seeks to artificially reduce the additional housing requirement. This is unacceptable. The MIR also completely fails to provide for a generous supply of housing land (see Scottish Government response to the SCV SDP). The MIR then goes on to use an alternative calculation not supported by the Scottish Government. Need and demand has not diminished as shown by the GRO projections. The rejection of the GRO projections runs contrary to supporting sustainable economic growth.

73 – The SDP must adopt the GRO projections, it is better to plan for high growth using a phased approach and environmental controls. It is not good enough to meet minimum requirements but a generous supply of land must be provided.

73 – There is no land use justification for not meeting the housing requirement set out in the HNDA in full – as such the additional housing requirement should be increased to at least 61,000 spread over the period to 2035.

73 – There is a significant qualitative and quantitative backlog in the housing land supply as a result of a mismatch of supply and demand. The HNDA identifies this in relation to affordable housing (para 6.79). The Scottish Government have indicated that it is inappropriate not to identify a land supply for affordable housing (GCV SDP).

77 – It may still not be achieved in the suggested timescales.

79 – Fundamentally question the figures and the need for so much more housing.

Employment land

5 – Concerned about the coverage of employment land in the Main Issues Report.

5 – Circumstances for the development of employment land have deteriorated significantly since the approval of the current structure plan and as a result it is important that the new plan specifically and thoroughly addresses the issue, at least as expressed in the current structure plan.

19 – A 5 year supply of employment land must be clearly identified in LDPs and regularly monitored to ensure they are effective.

19 – Support the development of strategic employment sites.

19 – Suggestion that there may be disadvantages of the scale of employment land currently identified which need to be investigated during the plan preparation process.

43 – The generous allocation of employment land does not sit well with the development of sustainable mixed use areas. Separate allocations for employment land do not sit well in this context.

73 – Demand remains high, with employment forecast to increase by 11% by 2020. It is appropriate to plan for continued employment growth of a similar scale to recent experience. There is a current shortage of large-scale sites, with class 4 uses increasing in particular.

Population and household growth

16, 20 – The population of Aberdeen City and Shire is the same as it was 15 years ago...it is not “rising fast” (para 1.1).

28 – The housing market areas are based on data from the 1970’s. Continuing to use these boundaries would undermine the plan because a lot has changed since then. The boundaries established by the DTZ study of 2007 should be used instead, showing an expanded AHMA to include Catterline.

51 – The overall approach to housing supply seems sensible and are content the focus on delivering the changes required by the current structure plan rather than seeking more land release.

51 – Pleased to see a proposed plan being taken forward in the context of a robust and credible Housing Need and Demand Assessment.

51 – Would welcome further discussion of phasing dates in Figure 6 in light of SPP para 72. Also important to be able to demonstrate how much of the existing supply is capable of development within 7 years of plan approval.

51 – The HNDA identifies evidence of the housing needs of Gypsies/Travellers. This may need to be addressed in the Proposed Plan.

58 – Do not support adjusting the growth target and housing requirement in line with the HNDA. There is a need to identify a higher housing requirement and allocations to be consistent with SPP.

61 – The allowances in the schedule are too high at 52% above the requirement.

63 – Type and number of housing needs attention, with development in areas not relying on new infrastructure which may be difficult to provide. Masterplanning appears to be working very well. Quality of life may suffer if ambitious growth plans are pursued without the required infrastructure and facilities. The plan needs to be scaled back to be more realistic and deliverable. Quantity must not be at the expense of quality as quality of life is fundamental.

71 – The SDP should encourage the LDPs to make generous provision for housing and employment uses in line with Scottish Government policy.

72 – No explanation of the population and household scenario used as a basis for the MIR is given.

73 – It is unlikely that Elsick will deliver units until 2017 at the earliest. There is no prospect it will deliver units in the first plan period (Appendix 4). If this is replicated elsewhere it has implications for the need for additional housing land.

73 – SPP requires that the SDP identifies a supply of effective housing and employment land that is deliverable. Ineffective sites means that additional sites are required.

82 – Although the proposed allocations have changed, the phasing has and there are options for addressing water efficiency. It is SNH's view that it is not yet possible to say (beyond reasonable scientific doubt) that the abstraction required to service these allocations would not have an adverse impact on the integrity of the River Dee SAC. Failure to comply with the Habitats Regulations would mean that the plan could not be adopted. A number of options exist ranging from reducing the allowances or their phasing, introduce proposals to source water from a different catchment, caveat the plan for the release of sites, or be in a position to remove the current doubt through further information and mitigation measures (such as the water efficiency standards).

85 – The MIR contains an over-stated requirement and an over-ambitious target for new house building, with uncertainty expressed in the MIR itself (para 5.21). The financial crisis is still very much alive and its implications will continue to be felt. The plan needs to better reflect that reality as unjustified assumptions have potentially serious consequences.

85 – Welcome the reduced housing allowances and the longer time-frame to 2035.

85 – A clear view of the available evidence is required rather than relying on the SDPA's aspiration. The evidence presented appears contradictory, with the balance between Aberdeen and Aberdeenshire being an example of evidence being disregarded. The new population figures must be treated with great caution.

Connectivity

Q6 Do you agree that the strategic development plan should put more emphasis on the transport network in encouraging economic growth and the role of Aberdeen Airport in particular as an important gateway?

6, 7, 8, 9, 15, 17, 19, 22, 27, 36, 43, 44, 46, 47, 57, 59, 61, 64, 65, 66, 72, 75, 77, 78, 79 – Agree that greater emphasis should be put on improving the transport network.

6 - A city that is easy to access and comfortable to move around in is considered more attractive for the people who live, visit and invest there, enhancing the vitality and viability of the city centre.

7 – Important that priorities for investment are identified along with constraints and appropriate mitigation.

8 – The bulking and transfer of waste and resources by road from all parts of the area to specialist treatment facilities will benefit from improvements to the transport network.

10 – Emphasis on the transport network is valuable but are based on the discredited 'predict and provide' model rather than looking positively at ways to reduce the use of cars and air travel.

10 – The assumption that over longer distances air travel is the only viable mode is flawed. In the same way, the AWPR is likely to increase travel rather than making it more efficient and effective.

10 – Not limited to transport emissions but air pollution is a key issue that needs to be addressed.

11 – Disagree with para 5.25, quality growth is better achieved with electronic connectivity.

11 – Not roads and not at the expense of the environment or quality of life (para 5.27)

11 – Policy for the airport seems muddled. The population is not large enough to sustain frequent flights to Europe. One “central Scotland” airport with high-speed rail links would be better. Aberdeen Airport is unlikely ever to be an important gateway but improved public transport would help.

16, 20, 29, 56, 79 – Improving public transport is fundamental to encouraging economic growth.

17 – Cycle paths and bus lanes should also be considered as much more sustainable.

19 – Transport is often an obstacle to development projects and the SDPA must continue to seek government support and funding for crucial projects.

21 – Development affecting the safety of level crossings on the rail network is a very important issue which needs to be considered in the SDP [suggested policy wording].

22 – Upfront funding by the public sector is required to stimulate development.

23 – The main issues of the plan are all around road transport which impacts negatively on the environment. The AWPR will only encourage building out of town and commuting by car.

27 – Aberdeen Airport is the north east’s principal gateway and strongly supports proposals to make the link between transport connectivity and sustainable economic growth more explicit and place greater emphasis on the importance of Aberdeen Airport as a strategic domestic and international gateway.

27 – The airport should be identified as a strategically important transport facility in the strategy map.

27 – Aberdeen City and Shire is increasingly competing against other – often better connected – regions. It is therefore essential that the development plan recognises this and responds with a strategy and proposals which improve connectivity, including surface transport to the airport.

27 – The Airport supports efforts to progress the AWPR and the A96 / Dyce Drive link road.

27 – It is important that the development plan makes reference to the necessary criteria for particular types of development such as wind turbines and certain waste management facilities which can have safeguarding implications for airports.

30 – Sustainable modes of transport, not roads and air.

31 – Transport is a key opportunity and constraint in relation to sustainable economic growth.

31 – Support a transport strategy that guides new development to areas already served by good public transport but recognise that some elements of the SGAs may exacerbate existing air quality problems.

33 – Pipelines are a sustainable means of transporting potentially hazardous materials and as such should be recognised and protected through the SDP.

36 – Stonehaven lies in a thoroughly sustainable location on a major transport corridor.

38 – Wish to see more emphasis on co-location of employment uses with housing.

38, 39, 57 – Support for the role of Aberdeen Airport as an important gateway to the city.

43 – The emphasis should be on rail infrastructure improvements, including incremental improvements to the local rail network.

43 – The SDP should identify how infrastructure improvements will be secured. There is already an undue burden on the private sector from developer contributions.

44, 65 – The onus for delivering transport must not be put on the development industry.

45 – Airport is a fact of life largely outwith our control.

45 – Future developments need not be restricted to where a transport network exists. Proposals must be considered on their merits in the context of the local economy.

46, 47 – The AWPR will create opportunities not only in and around Aberdeen but also on the main routs into the City and settlements like Banchory should be considered for further development to take advantage of these opportunities.

49 – Use of airships as an alternative method of transportation.

57 – The North of the Don Masterplan allows key linkages between the airport, Energetica, the north of the city and strategic transport links.

59 – It is essential that the SDP and RTS work together and at the same time. The transport network will be a key factor in the economic success of the region.

63 – Action is required on the local road network which were never designed to cope with the current volumes.

68 – Overwhelming concern is the delivery of infrastructure at the right scale, at the right place and at the right time. The limitations of the current network are a significant issue but it is less about economic growth and more about quality of life. All the major projects are delayed which causes significant concern. Investing in public transport is key but is moving even further down the agenda.

72 – Nestrans should be making it a priority to review the RTS and roll it forward in line with the SDP.

75 – Poor transport infrastructure and connectivity is the single issue most frequently highlighted by business and community representatives as the principal barrier to economic growth and prosperity.

76 – Aberdeen airport should not be grown because of climate emissions from aviation.

77 – Road and rail upgrades are as important as the airport in improving gateways to the area.

78 – Landing slots at international hubs should be protected but the airport needs to be improved from its current ‘third rate’ status compared to its competitors.

81 – Nestrans support the three changes proposed in paras 5.27 – 5.29.

81 – Nestrans will continue to work in partnership with the SDPA to deliver the transport improvements required to support the SDP and its vision.

Digital infrastructure (Q7 & 8)

Q7 Do you agree that the strategic development plan should support the roll-out of high-speed broadband throughout the area, possibly including it as a proposal as well as a policy theme?

9, 10, 11, 15, 16, 17, 20, 24, 38, 39, 43, 45, 49, 56, 57, 59, 61, 64, 66, 72, 75, 77, 78, 79 – Yes

7 – High speed broadband is important in supporting business growth and networks need to be based on a viable business strategy.

7 – The SDP should provide strategic direction, with LDPs focusing on the detail of infrastructure required within developments.

11 – Digital infrastructure is a new concept but should enable radical changes but needs smarter thinking from the councils and public. Wireless should be adequate for most people and technology will continue to improve.

11 – Probably not economic in rural areas, so encourage people to live in the city.

15 – Kincluney Trust are already designing such a scheme.

24 – Flexibility and reliability as well as speed are important – keen to include in new developments.

29 – Unrealistic to think that the SDP will have any influence. Should concentrate development where it is more realistic (Aberdeen City).

30 – No, access to all must come before bandwidth.

57 – It is unclear how the LDP could implement or legitimately enforce such a policy position. If it was to be added to the growing list of developer contributions it is unlikely to be supported. Difficult to justify in terms of Circular 1/2010. Could be incorporated into large-scale long-term developments such as the North of the Don Masterplan.

59 – It may also reduce the commute to work.

72 – It is unclear how the SDP would seek to implement this through policy. The upgrading of the infrastructure is key.

77, 78 – High speed broadband is critical and should be tackled as a matter of priority. A stronger case for investment in the area must be made.

Q8 What role should new development play in encouraging the take-up of high-speed broadband?

9 – Maximise UK and Scottish Government contributions as well as additional developer contributions as with other infrastructure. Put pressure on BT to speed the upgrade process.

11 – Coordinate investment from business with ACSEF taking the lead. A critical mass will be required, with advantages for high-density development.

15 – Kincluney Trust will promote take-up.

16, 20 – Fundamental to both new and existing development.

22 – Enable capacity without taking the financial burden.

29 – Ensure links are built into new development to connect to the network if and when available.

30, 64 – None.

43 – Would be concerned over private sector development contributing financially to the delivery of high speed broadband. The Action Programme should set out how and when it will be delivered.

57 – New development should promote it but difficult to enforce. Different developments will have different requirements.

59, 61 – New development must be required to install the correct infrastructure in the same way that electricity and water are provided as a key element of new development areas.

65, 72 – New development can be encouraged to provide the capacity to connect to high-speed broadband as and when it is available but the financial implications must

be understood. Developers should not be financially penalised for assisting in the delivery of the infrastructure.

66 – New development will both increase the demand for and be contingent on the availability of high-speed broadband, encourage small businesses and working from home, reducing congestion, pollution and increase quality of life.

75 – There should be encouragement to make provision for the laying of new cables and associated connectivity for homes and businesses.

77 – Any physical development required needs to be accommodated. It should be incorporated in all new developments.

78, 79 – High speed broadband will encourage development, not the other way round.

Retail

6 – Important that the city centre continues to be afforded the correct level of protection and enhancement and that the retail elements of the current structure plan are carried forward into the strategic development plan (i.e. sequential approach and hierarchy of centres).

6 – The target is welcomed, along with the works that will be required to meet the target. There are a number of significant challenges in the city centre which need to be dealt with and the City Centre Development will hopefully provide the required enthusiasm provided the process is managed carefully.

6 – There are significant public realm improvements possible to the Union Street / George Street area which would improve the shopping experience and encourage retailers to invest further in the city.

6 – Out of centre proposals should not be supported to the detriment of the city centre purely because it would be a quick-fix opportunity in terms of investment.

40 – One paragraph (5.36) covers retail and only focused on Union Street. There needs to be a spatial strategy for retail growth in the city region in the same way as there is for housing and employment. Need to identify need and identify specific locations to meet that need. Large mixed communities such as Loirston make sense to be the locations for retail expansion and the new stadium can act as an anchor for new retail development which is well connected to the AWPR. There is a need to identify this location to avoid it falling foul of the sequential test which promotes the City Centre.

69 – One paragraph (5.36) is too little in view of the topic's strategic significance. However, the references in the current structure plan (particularly para 4.2) are supported and should be retained.

69 – Agree that the focus should be on improving the city centre's shopping, commercial, leisure and retail environment.

69 – Support the intention to update the target so that the city centre’s top-20 status can be retained.

71 – Welcome the acknowledgement that Union Square has made a positive contribution to the city centre. It is important that the SDP allows for the adaptation, growth and reconfiguration of centres such as Union Square if the overall aims for the city centre are to be achieved.

Q9 Are there any other changes needed to the current structure plan which would further support sustainable economic growth in the area?

7, 66 – No

8 – Just those identified under section 7 of the MIR (Managing resources efficiently).

9 – Build a strategy explicitly to re-use old oil industry assets.

10 – While responding to climate change is essential, there are wider issues of sustainability such as the maintenance and enhancement of ecosystem services.

11 – Coordinated road and workplace car park pricing to encourage a modal shift to more sustainable transport.

15 – The identification of a Plan B, additional areas that might be suitable for large-scale growth.

16, 20 – Current transport plans pay lip service to modal shift, we need a light rail system.

24 – Need to find a way forward with current development land. Subsidised housing for some at the expense of others in the current climate is not working. A standard tax on a new house would be fairer and more transparent.

30 – An emphasis on people and to provide a healthy and stimulating environment, the opposite of what will be created by the 3rd Don Crossing.

38, 39 – More emphasis should be placed on the provision of sustainable communities and the co-location of homes and jobs.

43 – Sustainable mixed communities and accessibility objectives should be combined, the default should be for all development to be walkable mixed use communities through design.

43 – The current strategy of allocating large expansion areas will result in land being developed by the large development companies and such sites are inherently problematic in satisfactorily achieving sustainable mixed use development. The councils may well come under pressure to approve a scheme which does not display best practice in terms of place-making.

45 – Hopefully the developments within the scope of this plan will take us beyond the dominance of oil. What will sustain our economy and communities then? If we don't know, how can we plan for the next 25 years?

49 – Stop using the carriageways of roads as service areas for utilities as this causes traffic problems. Don't locate all businesses in one area of a town (ie Westhill).

57 – May be useful to add focus by identifying areas particularly suitable for large-scale growth.

59 – It is essential that future expansion of the transport network is allowed for when allowing housing and commercial development.

64 – Through trains from Elgin to the central belt.

72 – The provision of a development and infrastructure action plan.

74 – Specific mention should be made of the strategic importance of Aberdeen Harbour to the regional and national economy and to offer protection from conflicting uses.

75 – Multi-modal freight hubs are required as well as more short sea shipping of freight.

77 – Emphasis should be placed on upgrading the existing road and rail network with the addition of the 3rd Don Crossing, a new Bridge of Dee and the AWPR. Twin-track the railway between Huntly, Aberdeen and Laurencekirk to improve Crossrail services and reduce car commuting (sufficient car parks at stations). Funding from Fig 8 models 1 and 5 along with the strategic transport fund. There needs to be assurances that the fund would be realistic, manageable and ring-fenced.

78 – Although many of the transport projects are welcome, a more joined-up transport plan for the region is required covering the taxi network, waiting times at the station and airport, express rail service to the airport, Glasgow and Edinburgh.

79 – Bold steps to encourage the modal shift to public transport.

82 – Clarify what sustainable development really looks like.

6 – Supporting development (Q10 - 13)

11 – Tax greenfield to facilitate brownfield development, with infrastructure costs paid from the taxes. Infrastructure costs are a good financial discipline and measure of sustainability.

11 – Strongly object to the 3rd Don Crossing (para 6.15) as it will be fundamentally unsustainable. The funding proposal (para 6.19) is a fudge with low transparency and poor governance.

45 – No simple model for the creation of infrastructure, all options may play a part if there is the political will and courage to pursue them. To say we don't have enough money is a cop out for those who gather and distribute power and opportunity through the democratic process.

Q10 Are there other measures that the strategic development plan should be exploring to encourage development?

7, 66 – No

9 – Energetica and other job creation initiatives.

11 – Higher density housing, with retail only permitted with housing above.

15 – Flexibility and a pragmatic approach to 'desirables' to reduce the demands on developers to ensure that sustainable high quality places are delivered.

17 – Tourism needs a focus. There are no large attractions and something of scale is required to attract tourists in increasing numbers.

22 - Ensuring clarity early on in the development process of the overall financial contributions that developments are expected to make. Flexible approaches to affordable housing provision and flexible phasing of developments and key infrastructure. Short term pain on some infrastructure to allow developments to commence will provide longer term gain.

29 – Emphasise small sites close to Aberdeen with good transport links.

30 – Community centred development such as community trusts, social enterprise schemes etc.

31 – Energy infrastructure requirements to achieve climate change targets, including heat networks and local generation. Energy storage and enhancements to the grid will be required. Recognise some of these are highlighted in s8.

35, 36 – The SDPA should strongly adhere to the Scottish Government's policy by allocating a generous supply of housing land, particularly close to Aberdeen. Smaller sites which can make use of existing infrastructure should be preferred in the current financial climate.

36 – The role of developers in respect of appropriate contributions, affordable housing and regeneration support must all be addressed.

38, 39 – Front funding of infrastructure by the two Councils would help to unlock many of the development sites.

43 – The strategy of the SDP should incorporate flexibility for smaller scale mixed use sites that are less likely to place a burden on other services, facilities and infrastructure.

43 – The planning system should incentivise mixed use development, ensuring developers profits are enhanced through the delivery of sustainable mixed use schemes. This could be done through reduced affordable housing or other planning gain contributions. At the moment there is a financial disadvantage to developing in a sustainable mixed use way.

44, 65 – The SDP should give more guidance to the planning authorities on how to reduce the demands on developers and how to work more efficiently with existing infrastructure. A more streamlined list of developer contributions.

45 – Yes...what are they?

46, 47, 48 – The range of measures explored is limited. It is disappointing that the preferred option falls entirely on the development industry. The SDP should do more to identify innovative funding mechanisms as a route to encourage development.

50 – As a Key Agency, Scottish Water are represented on the FIRS group and will continue to work closely through this in identifying ways of enabling development, being funded to upgrade strategic assets on the basis of five growth criteria.

57 – Flexibility and a pragmatic approach to ‘desirable’ developer contributions.

59 – Move the SGAs away from the transport arteries.

61 – No, the plan oversteps the mark in being so pro-development. The language of ‘targeting’ growth and ‘promoting’ development is inappropriate and the plan should be neutral, enabling and directing.

63 – Review the capacity of new schools because of capacity issues in a time of recession where private schools may not be as affordable.

64 – Questionable whether development should be encouraged. Sustainable development, however, is essential. Development should involve full consultation and engagement with communities, respecting natural and built heritage. Planning gain should be discussed in an open and transparent way.

68 – Infrastructure must be in place before homes are built. Upfront costs should be underwritten by the Scottish Government. Councillors should be cautious about approving applications until they are certain of the delivery of appropriate mitigation.

71 – Welcome commitment to tackle barriers to development and the commitment to a positive agenda for growth.

71 – The SDP (and subsequent LDPs) needs to be realistic and flexible. No longer possible to front-load infrastructure requirements. Important to support incremental development.

72 – All public bodies should explore all financial measures to deliver development, cash flow can render projects unviable so it is essential projects do not become over-burdened.

75 – A fund to provide assistance to developers to fund marketing and feasibility studies on key sites.

77 – Difficult when conventional funding streams are drying up. Need to apply for what little funding there is. Should be assertively involved in attracting funding to kick-start development.

78 – A European Capital of Culture bid.

78 – Imaginative redevelopment of the harbour.

79 – It is important to retain the quality of the environment with tight planning or this will result in low standards and long-term degradation.

Q11 Do you agree that using supplementary guidance to deliver identified transport projects by development charging is the best approach?

7 – The delivery of the approach needs to be established before the SPG is adopted.

9, 17, 37, 66, 68, 77, 82 – Yes

11 – New development should bear more of the costs for associated infrastructure.

15, 22, 29 – Concerns about the nature of the links between specific developments and interventions.

16, 20 – Reasonable idea but £2,064 per house is paltry and a token charge which will leave the taxpayer to fund development.

17 – Danger of delay or abandonment of projects.

19 – The use of supplementary guidance is useful as it provides certainty as to expected contributions. Also support the pro-active, collaborative approach of FIRS.

19 – Up-front funding is very problematic for the private sector and welcome the continuing efforts of both councils to investigate new and creative approaches to supporting development, including the use of public funding streams, local asset backed vehicles, TIF and prudential borrowing.

21 – Developers should make contributions where development creates a significant change in the use of the rail network. Rail infrastructure should be included within any developer contributions policy.

29 – A common charge is inappropriate, specific contributions must be linked to specific impacts.

30 – No, road / congestion charging to enable a shift to a more sustainable and inclusive society.

34 – Most renewable energy developments create very little demand for transport infrastructure during use so should be exempt from contributions.

35, 36 – Models for the delivery of infrastructure are not really a matter for the MIR. These require significant exploration and discussion before they can be implemented. Must be cautious about placing disproportionate cost on developers who may go elsewhere to areas which do not have such onerous requirements.

36 – Significant concerns over para 6.17 and the fact that the guidance has been out for consultation but not published alongside the MIR in a clear and transparent way.

37 – We commend the SDPA and Nestrans on these innovative proposals and would welcome sharing of further information and experience in developing the SPG.

38 – The CTA does not provide a basis for the implementation of the STF.

38 – Transport modelling will still be required to address local impacts (para 6.16).

38 – Inclusion of particular schemes appears to be arbitrary in nature and many are site-specific.

38 – There is no clear distinction between strategic and local network improvements and it may not be possible to draw these distinctions.

38, 39 – More work should be done to ensure the STF is compliant with national guidance and does not require contributions towards already committed schemes.

38, 39 – A developer should not have to fund an improvement somewhere on the network unrelated to their own development.

43 – No objection in principle to the preferred option but have some concerns over the detail.

44, 65 – Major concerns with the current approach given the lack of robust evidence, the link to individual sites and the inclusion of public transport projects which will generate profit for bus operators.

45 – If this is the best the planning system can do it should take a back seat if there is someone else who has a better idea.

46, 47, 48 – It is unacceptable. Contributions are unlikely to relate directly to the impacts arising from the development and could be considered contrary to Circular 1/2010. It is tantamount to a development tax and is more likely to discourage than encourage development.

49 – The Scottish Government need to be more flexible.

51 – We think this approach represents an innovative and pragmatic approach to deal with a very difficult problem. The approach taken is commendable.

51 – You should aim to ensure development interests remain closely involved and supportive of both the approach and overall level of contributions required to support new development. These must not threaten the viability of well-conceived development. May wish to consider a mechanism for consulting the development sector on phasing and prioritisation in the years following adoption of the guidance.

56 – Sounds a good idea but concerned developers will delay payment and hold back essential infrastructure. Payment by instalments will be essential.

57 – Previously expressed concerns about the link between developments and interventions.

59 – It is one approach but central government should also pay.

61 – Major new developments can only be acceptable if supported by transport enhancements and the SPG is supported.

63 – STF will assist with city-wide issues but not local issues and delays to implementation of schemes could cause problems.

67 – Supportive in principle but concerned that cycling infrastructure is not eligible for funding. Strategic investment in cycling is essential to ensure a consistent and connected cycle infrastructure in the development corridors. A fragmented network will fail to achieve strategic objectives.

68 – Concerns about deferred payments, contributions should be upfront. A wish list until feasibility and design studies have been completed.

71 – Concerns around the detail (see response to draft SPG).

72 – There must be realism about the delivery of infrastructure. Generally support the principle but concern about some of the detail. Contributions should only be used to improve infrastructure at the most local of levels. Infrastructure funding needs to be looked at holistically.

74 – Strategic transport infrastructure improvements may be required for projects beyond the identified schemes. The Aberdeen Harbour Board are committed to working with the SDPA and City Council to ensure the future operations of the harbour are adequately serviced by strategic transport infrastructure.

79 – Welcome development charging as long as it covers the cost and is paid upfront or by instalments. Communities suffer if infrastructure is delayed.

81 – Nestrans is fully supportive of the proposals for a strategic transport fund and the supplementary guidance to deliver it.

82 – Active travel should be given a high priority in the use of the fund and can often be incorporated within green networks.

Timing of new developments and the AWPR

51 – The Scottish Government remain committed to the delivery of the AWPR (northern leg, southern leg and fastlink).

51 – Transport Scotland will continue to work with the various groups to define transport improvements that can be taken forward in advance of and in support of the AWPR.

77 – To maximise the benefits of the AWPR the SDP should be explicit that the road will not become another residential or industrial development corridor. New development needs to be clustered and should be delayed until construction has started. Some of the junctions may need to be improved, either by the developer or via the strategic transport fund.

Affordable Housing

11 – Affordable housing should not mean a lowering of standards. Percentages should be increased when prices are high.

15 – Kincluney Trust is proposing 30% affordable housing if it was to be given permission.

29, 85 – Strongly agree that increasing the percentage to 38% would be out of the question and would inhibit the overall level of development coming forward.

35, 36 – Support maintaining the current level of affordable housing but concerned at suggestion of examining whether there is a need to increase the percentage for each site.

35 - 50% of units on the site adjacent to Fyfe Park Kemnay are to be affordable.

35, 36, 73 – The full range of delivery options for affordable housing must be available, including off-site options.

38, 39 – Pleased to note that the MIR recognises that the increased need for affordable housing could be linked to the drop in completions.

38, 39 – Insisting on a range of house sizes and types on every site will ensure that developments generally are more affordable.

43 – The SDP should confirm that the delivery of affordable housing should generally be no less than 25%. The provision of 'more affordable' housing as part of the mix should be taken into account when negotiations take place. Non-mixed use proposals could be required to deliver higher levels of affordable housing.

46, 48 – Affordable housing can only be achieved through the continued development of mainstream housing. It is sensible that the MIR recognises that requiring 38% would make it more difficult to deliver housing at all.

46, 48 - There is a continued expectation that around 25% will be delivered on every site. The requirement should be lowered to facilitate development and this might actually increase the number of affordable homes built in total. Greater flexibility is required.

51 – The Chief Planner has asked all planning authorities to reflect on whether contributions of 25% or more are likely to be deliverable in the current economic climate. The SDPA and the two councils need to satisfy themselves that the numbers this policy will potentially require with the number of housing products that can be delivered with less subsidy and still meet the needs identified in the HNDA.

51 – The Innovation and Investment Fund was a 1-year fund for 2011/12. Discussions are taking place with stakeholders on how to deliver a forward programme of new housing supply which both achieves high rates of leverage but also allows councils and housing associations to plan ahead with confidence.

58 – The MIR correctly identifies the challenges of securing the delivery of affordable housing and that new and innovative ways must be found.

62 – It is important that affordable rented housing, particularly in rural areas, is made available to people with local connections rather than having a ‘take your one chance’ policy which can lead to family and social breakdown.

63 – We need to look at more effective ways of delivering more affordable housing sooner.

72 – It needs to be clear that 25% is the maximum level of affordable housing.

73 – There are clear differences in affordable housing need across LDP areas so a blanket approach is unjustified.

73 – The approach runs contrary to the letter from the Chief Planner of 15 March 2011 which advocates a flexible approach. This could be delivered through a reduction in affordable housing percentages.

85 – Only development over a certain size should have the 25% requirement imposed upon them (over 4 or 5 houses).

Q12 Are there other ways the strategic development plan could encourage the development of more affordable housing?

9, 79 – No, but monitoring is very important. When financial conditions improve there needs to be real pressure on developers to increase provision of affordable housing. Clear targets and a strong negotiating position will be key.

11 – New development should bear more of the costs for associated infrastructure.

15 – Flexibility is key and this could be facilitated by changes to the definition of the strategic growth areas.

15 – New models are being developed such as “Resonance” from Rettie & Co.

16, 20 – Social housing should be built first.

17 – The idea seems satisfactory.

19 – Previous concerns over unrealistic demands for affordable housing, with a need to consider the cumulative impact of all contributions on viability.

19 – How can the private rented sector play a greater role in meeting housing needs, particularly when (reasonably well paid) households are unable to access the market?

22, 57 – Flexibility is key. Affordable housing does not need to be social rent delivered by a Registered Social Landlord.

24 – Need to find a way forward with current development land. Subsidised housing for some at the expense of others in the current climate is not working. A standard tax on a new house would be fairer and more transparent.

29 – Cannot principally be addressed by the planning system.

30 – More emphasis on affordable housing, with a 40% requirement for developers. Greater borrowing by councils.

42 – Affordable housing should not be concentrated in the large settlements.

44, 65, 72 – Partnership approaches to delivery must be encouraged, particularly initiatives emerging from the Scottish Government. Developers are well-placed to deliver low cost homes and shared equity. The different types of affordable housing must be seen as a menu rather than a sequential list, being flexible and using the full range of options available.

45 – Lowering standards does nothing for affordability. If better housing is made available, what is less desirable becomes affordable.

49 – Reduce house prices to make them affordable as they are over-valued. In line with earnings to retain the workforce.

56 – Developers prefer greenfield. Brownfield should be strongly prioritised and not at the expense of affordable housing.

58 – The identification of a generous supply of housing land, more than is currently identified in the MIR.

59, 66 – The policy needs to be more robust in the SDP and LDPs to stop developers getting away without providing enough affordable housing.

61 – Affordable housing should be a requirement within every site.

64 – Through including Kemnay in the SGA.

65, 72 – The SDP should make it clear that the percentage requirement should be for an ‘affordable housing equivalent’ as the cost of different methods varies.

66 – Consider incentivising the supply side by fiscal means.

68 – There is an affordable housing crisis and there is no coherent strategy to address it. The approach is predicated on a large number of private sector homes being delivered which is very unlikely to happen.

77 – Difficult, because mixed developments are the way forward.

Q13 Should we consider rolling out a wider infrastructure fund along the lines of that suggested in the Scottish Government research which goes beyond transport infrastructure? What advantages would this bring?

7 – The delivery of the approach needs to be tested before a wider commitment is made, in particular during a period of economic downturn.

9 – No as there is a danger that significant projects would never be completed.

11 – All transport arteries should be underground to free up space in city centres.

15 – It is worth considering.

19 – Supportive of the suggestion where the councils are willing to forward fund some infrastructure to facilitate development.

22, 44, 65 – Any changes should be led by the Scottish Government, not planning authorities. The SDPA should work with the Scottish Government to consider new models for the future. We agree with para 6.39.

29, 59 – No.

30 – Absolutely, with community control.

38, 39 – A ‘roof tax’ would, on the face of it, speed up the planning process but payment would need to release developers from any restriction on construction pending provision of the facilities. Provision within a development site by the developer is generally quicker and cheaper. However, it is difficult to see how a standard levy would comply with Circular 1/2010 and payments would need to be ring-fenced to provide infrastructure for a particular development.

43 – This may be beneficial within the SGAs but is not appropriate elsewhere. Any such fund should be subject to further consultation.

45 – Advantages would be more jobs for theoreticians...lets not make things worse, time will do that anyway.

49 – No clear path ahead. Too many silly rules and regulations (eg fishing and farming).

57 – Whilst it would create a fund it is unclear how it would be collected or spent.

61 – Yes, covering water, waste, education and other needs. Specific requirements by the developer, wider requirements spread among all developments to provide a fair, open and realistic way of providing strategic infrastructure.

66 – Caution is the better part of valour.

77 – Yes, funded by developers and other stakeholders purchasing shares. Advantages would be ready-made tie-ins for developers and wealth creators as the region develops.

82 – An advantage would be the integrated delivery of infrastructure, including green networks. This is more likely to deliver sustainable places.

Regeneration

3 – Regeneration priority area status makes no difference to Fraserburgh in helping it get back on its feet.

51 – It would be helpful for the Proposed Plan to set out how the regeneration strategy for the regeneration priority areas in Aberdeen City is being taken forward.

7 – Managing resources efficiently (Q14 – 19 and 22 - 30) inc Appendix 2 & 3

11 – Do not let the tail of the economic cycle wag the dog. This document should be about principles.

17 – Consideration needs to be given to the number and density of wind turbines planned for Aberdeenshire.

23 – Scotland is losing 1000ha of arable land to development each year and this is unsustainable if we don't want to seriously affect our ability to produce enough food in Scotland.

31 – The links between climate change adaptation and mitigation could be strengthened.

31 - The avoidance of flood risk for example is the most sustainable solution. Welcome the Strategic Flood Risk Assessment.

31 – Different types of land and land-use act as carbon sinks and these need to be protected in the context of climate change.

31 – Land use plans have a key role to play in delivering the objectives of the Water Framework Directive to promote and improve the water environment and the proposed plan should take a strategic catchment based approach in line with River Basin Management Plans.

34 – Support for the retention of the renewable energy target set out in para 7.2 as consistent with national policy.

34 – A vision for the introduction of renewable heat does not appear to have been provided alongside other carbon reduction aims.

51 – The Proposed Plan should be informed by the ‘Routemap for Renewable Energy in Scotland’.

51 – The Proposed Plan should consider how it can best support renewable energy production by considering opportunities for biomass for heat and energy. Use can be made of heat mapping to identify communities with high demand and resource potential. This can inform policies which promote district heating and heat networks.

51 – Whilst not a major issue for the SDP, it would be helpful for the Proposed Plan to identify the need to expand woodland cover throughout Aberdeen City and Shire as part of the wider spatial strategy.

54 – SSE Generation support the positive approach to planning for energy generation set out within the MIR.

54 – Suggest caution over the presentation of the 100% target for renewable energy generation in the city region as the 100% target is a Scotland-wide target and some areas will have more potential than others and the Scottish Government have not required the setting of local targets. Suggested that the city region should aim to contribute as far as possible to the national target of 100% by 2020.

54 – The extent of the renewables resource does not appear to be set out in the MIR and this could be further developed in the SDP.

63 – Concerned over whether current sewage infrastructure is fit for purpose, with no plans to upgrade or replace them. Discharges to the River Dee are a concern.

73 – The need for, area and policy to cover the green belt is a serious omission. It is important that the SDP recognises that the green belt is not intended to protect natural heritage or safeguard land for major uses and it would not preclude the identification of land between Ardoe and Maryculter for sustainable and accessible development.

76 – Natural flood prevention features need to be retained, such as sand dunes at Balmedie, rather than sacrificed for commercial development.

76 – Do not support biofuel plant unless fuel is local and renewable.

Carbon neutrality in new development

15 – Kincluney Village will be as close to carbon neutral as possible.

51 – Climate change is soundly embedded as a cross-cutting theme within the MIR.

51 – The Climate Change Study is excellent in fully considering the international and national context as well as responses required locally.

51 - Happy to see sustainability labelling referenced but final sentences of options 3 and 4 should refer to planning applications rather than building warrant applications.

51 – Option 4 seems most pragmatic.

51 – Para A2.7 may create a tension with s3F of the Planning Act. While the economic cost is noted, LDPs must conform to legislation and the SDP should not prevent this.

55 – Unoccupied non-domestic buildings such as converter stations or substations should not be covered by these requirements.

72 – This should be left to Building Regulations rather than the planning system. The SDP should not set any target and look to the implementation of greener development on a more strategic level.

72 – Vociferous in working towards the repeal of s72 of the Climate Change (Scotland) Act 2009 and incorporating a ‘fabric first’ approach. The most cost-effective solution is essential.

76 – Use of low carbon building materials should be encouraged, including straw bales.

Q22 Should there be flexibility around the target in the current structure plan for developments to be carbon neutral by 2016 given the challenging financial climate?

7, 15, 17, 19, 22, 43, 44, 46, 57, 65, 66, 72, 75, 77, 85 – Yes

11, 30, 59, 61, 64, 79 - No

9 – Pragmatism suggests some flexibility but not to the extent of letting people off the hook.

15, 38, 39, 44, 65 – There is no need for the SDP to “out-do” national targets as this will discourage building and be contrary to the vision of the plan. Option 2 is supported.

43 – The current structure plan target needs to be balanced against achieving viable developments in the current economic climate. Alternative approaches can be employed such as using materials with low embodied carbon and layouts which encourage reduced use of the car. The SDP position should remain strategic in nature.

44, 65 – It should be set by the Scottish Government, not individual authorities. The authorities should concentrate on improving the existing stock.

45 – The financial and meteorological climate have always been excuses for inactivity. Letting progress slip further will not help. Make use of biomass district heating.

49 – A sense of urgency is required.

61 – Developers should not be allowed to disregard their obligations by claiming a ‘challenging economic climate’.

82 – The implicit significant barrier to viability is not quantified and nor are the potential savings. It may be reasonable to be flexible but within the context of ‘responding to the challenges of climate change’ being identified as a major influence on the MIR.

Q23 Is there an advantage in setting one standard for both council areas or should the current approach (with responsibility given to the two local development plans) be kept?

7 – LDP responsibility, given the differences between the two areas.

9, 16, 20, 17, 22, 30, 56, 57, 59, 61, 66, 77, 79, 82 – One standard as long as it is not a compromise.

15, 38, 39, 44, 46, 49, 64, 65, 72 – Option 2 is supported, one standard for the whole of Scotland as it is a national priority not a local issue.

43 – LDPs should set out more detailed policies.

45 – If one or two plans get this working we wouldn’t object.

Q24 Do you agree that option 4 provides an appropriate and consistent method to use to deliver improved levels of energy efficiency in new developments?

7, 9, 17, 61, 66, 75, 77, 82 – Yes

15, 19, 38, 39, 44, 46, 57, 64, 65, 72, 85 – Option 2 is supported.

30 – All aspects of sustainability labelling should be included.

43 – Sustainability labelling should be left to the LDPs or Building Regulations.

45 – No, they become the maximum standard from which industry tries to make savings. A pointless and unproductive task to inspect and monitor, who would pay?

46 – The imposition of more onerous targets in specific parts of the country is a disincentive to investment and is likely to have an impact on the local economy.

49 – Leave it up to the owner who has to pay.

56 – Unable to support without knowing the aspects proposed to be dropped.

57 – Planning does not have a platform from which it can realistically deliver energy efficiency in new development.

59 – Improve Building Standards.

65 – Avoid duplication of work with Building Standards.

Q25 Is 2018 (a two-year delay from the current structure plan target) a realistic target for carbon neutrality? If not, what would a realistic and challenging target be?

9, 38, 39, 72 – Option 2 is supported.

11, 30, 56, 61, 64, 79 – No, current 2016 target should be retained.

15, 57, 77 – A delay till 2018 is too optimistic, 2020 is challenging but more realistic.

17 – The sooner the better.

22 – Difficult to set a target until concept is proven possible.

43 – Sustainability labelling should be left to the LDPs or Building Regulations.

44, 65 – Do not know whether carbon neutrality is truly possible. Focusing on newbuild misses the opportunity to deal with the existing stock. The impact of the use of cars, planes and the oil and gas industry will mean the SDPA is unable to achieve carbon neutrality.

45 – Would be amazed if we get anywhere near carbon neutrality by 2035. What about planning and acting to improve our position locally rather than pretending we can make a global difference.

46 – A two year delay is unlikely to provide significant encouragement to the development industry.

49 – Disagree with the setting of targets as the goalposts are always changing.

66 - Yes

85 – A target of 2018 still looks very ambitious.

Water efficiency

7 – Water efficiency has value in terms of contributing to sustainable economic growth.

11 – This is a distraction because water is not in short supply in Scotland.

16, 20 – We do need to use fresh water efficiently and water storage may be required (only Aberdeen of the major Scottish cities has no major freshwater reservoir).

31 – Generally supportive of the focus on water-saving technology and recommend that a commitment to good ecological status and preventing deterioration should be key considerations. Welcome recognition of abstraction pressures and the encouragement of water saving technology in new development.

46 – Welcomes the encouragement to overcoming deficiencies by providing better integrated infrastructure to protect the River Dee.

50 – Scottish Water welcomes the emphasis placed on the need for greater water efficiency in all types of buildings.

50 – Scottish Water will continue to work with SNH, SEPA and the SDPA on the water abstraction from the River Dee.

72 – Is the SDP and LDPs the best mechanisms to address the problem? Added expense and complication will result from this approach. Water efficiency is already part of the building regulations.

Q26 Do you agree that using sustainability labelling within building standards is an appropriate way to deliver improved levels of water efficiency in new homes?

9, 15, 16, 20, 17, 30, 44, 56, 59, 60, 64, 65, 66, 77, 79, 82 – Yes.

31 – Generally supportive of the focus on water saving technology.

44 – A recognised scheme and a level playingfield.

45 – There may be better ways but if it can be achieved, get on and do it.

49 – This is a crazy idea.

50 – Scottish Water generally support the use of sustainability labelling within building standards as an appropriate mechanism to deliver improved levels of water efficiency in new housing. However, the upper levels are voluntary and developers will get no tangible credit for achieving higher water efficiency standards unless the whole building meets the higher standards. This may detract from the holistic nature of the standards.

50 – A developer will make the commitment to pursue a targeted higher level of sustainability from the outset rather than the building being measures post-construction to assess what level has been achieved.

51 - Happy to see sustainability labelling referenced.

65, 72 – It should be for the Scottish Government to set the timescales for implementation. Anything else will lead to confusion rather than a simplified system.

82 – A key way to reduce abstraction from the River Dee.

Q27 Is there an advantage in setting one standard for both council areas or should the current approach (with responsibility given to the two local development plans) be kept?

7 – LDP responsibility, given the differences between the two areas

9, 15, 16, 20, 17, 30, 56, 59, 61, 66, 77, 79, 82 – One standard as long as it is not a compromise.

44 – The same standard across the SDP but ideally across Scotland.

45 – It wouldn't make much difference.

46 – Yes, but it should be imposed by the Scottish Government rather than the SDP.

49, 64, 65, 72 – The standard must be consistent across Scotland.

Q28 Do you agree that the gold level should be the standard that new homes are designed to achieve or would there be value in phasing this in gradually? What would be the advantages of doing it more gradually?

9, 15, 16, 20, 17, 30, 45, 56, 59, 61, 64, 66, 79, 82 – Yes, gold from the start.

31 – Note the advantages but also the challenges of this approach. This option could provide a greater level of mitigation of abstraction impacts.

44, 65, 72 – Standards should be set by the Scottish Government without interference from planning.

49 – Bring back proper building standards for room sizes etc.

50 – There is a considerable amount of work to be undertaken to understand the design, performance, long-term maintenance and user acceptability of various water-efficient devices and systems. Scottish Water's approach is being developed through a range of pilot projects and research studies over the next 12-18 months.

50 - By the time the SDP is approved, the Scottish Government as well as other stakeholders may have moved the debate forward as to appropriate standards for water efficiency in new-build housing. We would welcome further discussions on how the important issue of water efficiency can be addressed appropriately within the SDP.

61 – Any phasing should extend the standards beyond those currently specified.

77 – There may be advantages in a gradual introduction.

Q29 Do you agree that non-domestic buildings should have to include water-saving technology? How could this be achieved?

7 – Masterplans and development briefs are an appropriate means.

31 – This would further alleviate abstraction pressures.

49 – Not possible unless subsidised.

50 – Non-domestic buildings should be encouraged to incorporate water efficiency technologies where this is considered appropriate. Standards such as BREEAM should be reviewed in this context.

9, 15, 16, 20, 17, 30, 45, 56, 59, 61, 64, 66, 77, 79, 82 – Yes, ask an architect.
Rainwater harvesting.

Q30 Are there any other measures that we should take to improve water efficiency either through the strategic development plan or in our other actions?

7, 9 – No

11, 65, 66 – Educating homeowners to conserve water. The SDPA should work with SNH and Scottish Water on this. We do not believe the planning framework is best placed to drive water efficiency forward.

15 – Amend the plan to enable Kincluney Village to progress.

16, 20, 30, 56, 79 – Encourage the introduction of water meters.

45 – Of all the countries in the world, can Scotland have a problem which is difficult to solve.

49 – Reduce leakage and waste.

72 – Infrastructure provision needs to be addressed with Scottish Water.

77 – Rainwater harvesting.

Alternative fuels for transport

10 – The nod towards alternative fuels and fuel efficiency is inadequate unless the councils can take some positive action to encourage these trends.

11 – Hydrogen fuel cells are the best long-term solution, with hydrogen generated by offshore turbines.

11 – Limit high-speed roads to pollution free vehicles to encourage a modal shift.

11, 68 – Emissions targets for transport.

37 – We fully concur with the views set out in paras 7.11 – 7.13.

51 – Agree with the proposed approach. This is a key contribution we would expect the development plan to make.

67 – Reducing emissions from transport is a key challenge but alternative fuels will do nothing to reduce congestion or improve public health.

81 – Welcome the recognition of the importance of alternative fuels for transport and agree that the RTS is the appropriate place to consider this in more detail.

Managing our waste

8 – Encouraged by the focus on waste and resource management within the MIR.

8 – New business opportunities will be created by the Zero Waste Plan and the growth expected across Aberdeen City and Shire in the local context a low level of current tertiary waste treatment facilities, some of the highest waste disposal charges and the current need to transfer most of our waste substantial distances by road.

10 – These sections on waste are among the best in the report and a major contribution towards sustainability.

11 – Restrict the use of non-recyclable plastics.

31 – Particularly pleased to see the proactive stance taken in relation to sustainable waste management issues which clearly set out a range of options.

45 – Any attempt to control waste management will fail. The figures provided are at best indicative. No artificial or theoretical restriction should be placed on those who are addressing the waste issue which has been ignored by the public sector for so long. Other organisations charged with environmental protection are better placed to control the situation than the planning system.

45 – The planning system has a responsibility to plan for all wastes, not just municipal waste.

49 – Ought to be a national rather than local responsibility as there are so many grey areas around different materials.

51 – The Proposed Plan needs to contain a strategy for waste management.

60 – The Foreword indicates the scale of the waste challenge but it is left to the penultimate section of the MIR, reinforcing the lack of recognition given to its significance to the environment and prosperity of the north east.

60 – Waste management changes will result in environmental benefits and economic opportunities.

63 – Site identification for waste facilities is critical so that suitable sites are chosen.

Q14 Do you agree that we should plan for regional self-sufficiency in managing our waste rather than being a net importer or exporter of waste?

7, 9, 10, 11, 15, 16, 20, 17, 30, 31, 41, 56, 61, 64, 68, 75, 77, 78, 79 – Yes, in support of sustainable economic growth.

8 – Option 2 is too restrictive. The primary aim should be to maximise the potential for treating waste as close as possible to the source within the SDP area. To gain the

benefit of economic investment, the importation of some wastes may be necessary to enable local treatment facilities to be viable. This would, in part, compensate for the resource value lost to the area by necessary exportation. The SDP should seek to identify those facilities which could be developed within the area and encourage this investment. The adoption of option 2 would have a significant negative impact on potential investment.

10, 11 – Whilst regional self-sufficiency is probably the most desirable, there may be a case for importing wastes according to the principles of industrial ecology.

15 – Kincluney Trust is seeking a fully self-sufficient design in relation to energy, waste, water management and sewage.

31 – Benefits for climate change and the local economy.

41 – Waste movements do not respect administrative boundaries and are determined by the market. Limiting the origins of waste at a facility is not sustainable as the closes facility may be in an adjacent area. Self-sufficiency but not by limiting facilities to only taking 'local' waste.

45 – We should not be thinking in these terms, let the market explore the options.

51 – Self-sufficiency for Scotland requires responses locally and in this regard, option 2 is supported.

59 – Yes. Need to improve re-use and recycling.

60 – Given the lack of robust data, uncertainty over waste regulations and the growth of the region, it is not reasonable at this time to align with any of the options outlined. The plan should seek to be flexible enough to accommodate the changes required while protecting the environment and investment potential, securing maximum retention of resources within the area.

66 – Impossible to apply cost-benefit analysis without detailed information.

78 – Consideration needs to be given to the particular wastes associated with the oil and gas industry, particularly Naturally Occurring Radioactive Materials. Provision needs to be made for hazardous waste treatment / disposal or the ability to export the waste to other areas for disposal.

Q15 Do you agree that, apart from extending time limits, there is no need for extra landfill space in the area?

8 – Yes, option 1 is the preferred approach. However, rigid timescales for extension should be set and they should not be used to accommodate failure to deliver the required alternative infrastructure.

9, 11, 15, 16, 20, 17, 30, 31, 41, 59, 61, 64, 66, 75, 77, 78 – Yes.

11 – Extending time limits may not be fair on local residents and new sites might help to spread the load.

31 – Welcome the recognition that there will still be a requirement for landfill and have a range of options to address this. If a different objective is chosen, this could impact on the need for landfill.

31 – Support time extensions in principle where capacity exists but landfill sites are also regulated by SEPA and operators would also require amendments to permits or licences to operate the site as well as planning permission.

41 – There are now three non-hazardous sites in the area. If PPC permits for two and a planning application for the third are approved these will meet the Annex B requirement over the next 10 years provided environmental impacts are acceptable.

41 – It is always preferable for landfill to be filled to its original design contours unless there are overriding environmental concerns rather than site extensions or new sites.

45 – Landfill space will still be required but until these requirements can be quantified, time is the only easily amended parameter.

51 – Content with option 1 provided it secures sufficient (but not excessive) capacity.

56 – It would be a desirable outcome.

60 – There is unlikely to be an appetite in the market for new landfill sites. Time extensions may be the best if not the only option.

60 – Economic pressures could result in a very few strategic landfill sites serving the whole of Scotland.

66 – Education, particularly of younger people is essential.

79 - Desirable

Q16 Do you agree that the policy framework should be tailored to stress the importance of meeting most of the need for new waste management facilities in or close to Aberdeen to both reduce the transport effects of development and make best use of the byproducts of waste-management processes?

1, 6, 7, 8, 9, 11, 15, 16, 20, 17, 30, 31, 56, 59, 60, 61, 64, 66, 75, 77, 78, 79, 82 – Yes. Support for the preferred option (Option 2) of regional concentration.

8 – It is important that some degree of flexibility exists, as proposed within the option itself due to the nature of the waste collection and management process.

11 – But away from population centres (noise and emissions).

31 – Welcome the recognition of waste management by-products as a resource, such as heat.

31 – Support the identification of employment land as potential locations but consideration should also be given to degraded, contaminated or derelict land as well as former quarries.

31 – Important that consideration is given to the cumulative impacts of waste management facilities.

31 – In addition to identifying existing waste management sites and the need for new facilities to deal with all types of waste (not just municipal), the plan should set out the type of facilities considered appropriate. This would give appropriate guidance to LDPs and the determination of planning applications.

41 – A combination of Option 1 (existing strategy) and Option 3 (identify sites) is preferable. Option 2 is overly restrictive.

41 – The MIR does not attribute any link between waste infrastructure and the Energetica area whereas using heat from thermal treatment would be a good strategic fit.

41 – The identification of sites in the development plan is the best way to speed delivery but there must also be flexibility to allow for other sites or permissions in advance of approval.

45 – Lets not constrain the future.

51 – Option 2 is well aligned with the Zero Waste Plan provided the capacities it delivers are consistent with it.

60 – In recognising the merits of the framework, the need for flexibility is highlighted. The proximity principle is important but this shouldn't preclude the import of waste where it is required to make facilities commercially viable. Options in paras 7.24 – 7.28 are too simplistic and restrictive.

60 – A number of small / medium sized facilities may better serve the area rather than a few more strategic plants giving locational choice and price competition.

64 – Policy should implement combined heat and power from waste and reduce the production of byproducts.

68 – Transport of waste by modes other than road (rail, ship or pipeline).

68 – Using electricity rather than heat removes the need to co-locating waste plants close to other land uses which are sensitive.

Q17 Do you agree that it is appropriate to leave it to the local development plans to decide whether a site-specific approach is needed or wanted in particular cases?

7, 8, 59, 60, 61, 64, 66 – Yes

9 – NIMBYism is a danger at the LDP level.

9, 30, 78 – The big picture needs to be fixed at the regional level.

11 – May be better coordinated nationally.

17, 68 – Only if the consultation and views of communities are taken into account.

31 – The issues that need to be considered are: support for the Zero Waste Plan; compliance with waste hierarchy; support new development; safeguard existing sites; clear locational criteria; provision for all waste; and waste prevention and management considered as a part of all new development.

41 – Agree as long as the SDP gives a firm strategic context as required by Annex B to the Zero Waste Plan.

45 – Yes, unless you plan a centrally planned economy. The private sector has been invoked and now the creation of a modern waste economy must be left to them to progress.

60 – It is a shame the LDPs are to some extent 'out of synch'.

66 – Subsidiarity

77 – No, cash-strapped authorities can make inappropriate choices because of their limited funding.

82 – Difficult to see how waste management facilities will be approved close to Aberdeen without a clear spatial framework within the strategic plan.

Q18 Will this policy framework encourage the move towards more sustainable waste management in Aberdeen City and Shire on a timescale to meet Scottish Government targets?

8, 9, 15, 17, 31, 57, 59, 66, 77, 79 – Yes

30 – No.

41 – Not without the changes previously suggested.

45 – Not particularly. The North East has fallen far behind other areas except in the level of fines incurred. The current structure plan failed to take the matter seriously and we are all likely to suffer further.

60 – We have still to witness the 'confident and courageous decision making' aspired to within the structure plan.

60 – Investor confidence will be damaged by the delay to this policy framework (not included in 2009 structure plan) and the approach of the two LDPs. The north east risks running foul of targets and consequently being fined.

64 – Not unless investments are made to support combined heat and power.

78 – Depends on the speed the authorities put the required facilities in place.

Q19 Is there anything more the strategic development plan could do to support the move towards the more sustainable management of waste?

7, 9 – No

8 – The plan could be more explicit in recognising the integrated role that the management of waste as a renewable resource has in terms of energy security, climate change and employment, including the importance of capturing those benefits locally.

11, 17, 79 – More pressure on businesses, retailers and takeaways to use biodegradable packaging and education.

15 – By assisting exemplar projects such as Kincluney Trust.

17, 77 – Yes, increased kerbside collection for recycling and minimise distances to recycling centres before focusing on energy from waste.

30 – Introduce waste charging.

31 – Reference to the importance of waste management and recycling in all new development as well as waste minimisation during construction. Reference in the SDP to set the context for LDPs. Waste minimisation should be an overarching policy. Consideration should be given to the use of sustainability labelling. Reference to the co-location of heat users and producers.

41 – Site identification is the best way.

45 – Waste needs to be thought of as a resource and opportunity, not as a problem to be disposed of.

49 – Those who set targets should fund them.

56 – A more aggressive timescale.

59 – The SDP should not limit waste management to the SGAs.

60 – Be more explicit about the integrated role of sustainable waste management in terms of energy security, climate change and employment etc.

60 – Waste and resource management are integral to all aspects of development and this should be clearly reflected as a significant consideration in all policies.

61 – Waste is a regional issue and less focus should be on the individual local authorities.

78 – The waste issues associated with the oil and gas industry need to be taken into account.

8 – Proposals (Q20 – 21 and 31 - 34) inc Appendix 5 & 6

8 – Waste management proposals merit more explicit mention in the plan to aid investor confidence.

39, 40 – It is not clear how much weight should be attached to the current structure plan proposals and this should be clarified in the strategic development plan.

46 – The proposals do little to assist or encourage the development industry.

Existing Proposals (Appendix 5)

Western Peripheral Route [1]

6 – Fully supportive of the proposal but concerned that it does not become a location for out of centre retail development and would seek strong policies to prevent this happening to the detriment of the city centre.

15 – A Plan B is required to deal with delay or non-delivery.

57 – It would seem appropriate to consider alternative scenarios given potential non-delivery of this infrastructure.

65 – The ability to deliver the vision of the SDP is compromised by uncertainty about the delivery of essential infrastructure which is outwith the control of the SDPA. There appears to be no recognition of an alternative scenario if the AWPR does not go ahead. Residents and businesses have a right to know what the authorities would do if this happened.

Improvements at Haudagain Roundabout [3]

11 – The proposals are urban vandalism.

Third Don Crossing [4]

4, 12, 16, 20, 26, 30, 79 – Opposed to the continued inclusion of the Third Don Crossing in the strategic development plan, with volume of traffic, inability to achieve its objectives, undermines Park & Ride, air and noise pollution, safety, the environment and impacts on house prices all cited as reasons.

11 – The proposals are urban vandalism and inconsistent with Proposal 15.

16, 20 – If it is a local project it would be inconsistent to fund it centrally as part of the AWPR.

New stations [8]

11 – More suburban stations are needed as a priority. A station at Kittybrewster would be useful.

38 – Unclear whether the proposal for a new station at Newtonhill are to be carried forward, with T6 of the Transport Background Paper suggesting that Crossrail concept has been effectively abandoned. It is critical that Transport Scotland (who have indicated that they do not support new or re-opened stations) work with both councils to support the level of growth proposed.

Strategic rail improvements (Aberdeen – Edinburgh / Glasgow) [9]

1 – Support this proposal as long as it is consistent with the Tayplan proposed plan and action programme.

37 – Tactran support priority being given to STPR Project 23 and that it is achieved through infrastructure and capacity improvements rather than service reductions at Key stations in the Tactran area. Concerned that STPR Project 6 (electrification north of the central belt) is not mentioned in the Scottish Government’s Infrastructure Investment Plan.

Putting Aberdeen Airport Masterplan into practice [10].

76 – Should not look to expand the airport because of climate change.

New community stadium [16]

11 – Should be accessed by a new station as without one there will be traffic chaos.

40 – The continued identification of the stadium project in the strategic development plan is supported, although the plan should delete reference to the site at the beach as the proposal is being taken forward at the Loriston Loch site to the south of the city.

40 – Contrary to para 8.3 and Appendix 5 (proposal 16), planning permission cannot be granted until a legal agreement has been signed, although a willingness to approve the application has been agreed by Aberdeen City Council.

City Centre Masterplan [17]

49 – Not required.

Upgrading the electricity grid [19]

55 – The Peterhead to Rothienorman upgrade is a committed project with a 2016 delivery date.

55 – References to “Leylodge” should refer to “Kintore” instead.

55 – Figure 14 may be out-dated.

New Proposals

Q20 Do you agree that the new proposals listed above are of national or regional importance and should be identified in the strategic development plan as helping to deliver the vision and aims of the plan?

7, 9, 15, 16, 20, 31, 56, 57, 61, 64, 65, 66, 75, 77, 79, 82 – Yes

15 – It would be appropriate to emphasis that the SDPA does not control the delivery of these projects.

17 – Given that two CCS projects have failed, this would seem ambitious.

22, 44, 65 – Proposals are of regional rather than national importance. Recognition needs to be given that delivery is not wholly in the control of the SDPA.

31 – Inclusion enables them to be considered through SEA and HRA processes.

38, 39 – It should be made clear who is funding each proposal and what role the councils have in each of the schemes.

45 – Happy these are being investigated but carbon capture has never been demonstrated at an appropriate scale and is a pipe dream of politicians and planners. No local benefit will come from CCS and electricity transmission so if it is needed at a national scale others will consider it at the appropriate time.

53 – NorthConnect believe that the project is of national significance and would help deliver the vision and aims of the plan due to the significant benefits it could bring to Scotland (security of supply of low carbon energy and market coupling to increase competition and reduce price volatility).

54 – SSE Generation consider the Peterhead CCS proposal to be of international significance given its potential exemplar status and support its inclusion in the SDP on that basis. Most of the elements of the consents required will be though the Electricity Act 1989 rather than the Planning Acts.

55 – SHETL agree that their projects are of national importance and should be specifically identified in the plan as helping to deliver its vision and aims.

57 – Need to emphasise that the SDPA does not control the delivery of these.

59 – A strategy is an action plan to achieve a set of goals. Having a plan is not enough, you need to achieve something.

70 – Support the inclusion of CCS proposals. Such schemes can include the use of the existing pipeline network for the provision of CO₂ transport

74 – The N-RIP is of both national and regional importance and should be reflected in the SDP accordingly.

77 – Carbon capture and storage and electricity infrastructure are vital projects.

Q31 Do you agree that the strategic development plan should support the capturing and storing of CO₂ from existing fossil-fuel power stations as a way of tackling the effects of climate change and helping with the move towards low-carbon energy?

7, 15, 16, 20, 56, 57, 59, 61, 64, 66, 75, 77, 79, 82 – Yes.

17 – Seems ambitious. Hope deeper than 120m (A6.7).

30 – Sceptical as to motivations and it relies on unproven technology.

45 – Using alternative energy sources / technologies is about embracing new technology rather than preventing climate change.

49 – By sea in pipelines.

61 – Need to recognise substantial public sector investment if it is to go ahead.

64 – Technological developments need to be monitored closely and implemented if appropriate.

82 – Already identified in NPF2.

Q32 Do you agree that proposals at Longannet (as it affects Aberdeen City and Shire) and Peterhead should be identified as proposals in the plan?

7, 15, 16, 20, 17, 51, 56, 57, 59, 66, 75, 77, 79, 82 – Yes, although the recent announcement re Longannet needs to be reflected in the proposed plan.

30 – No.

45 – A compressor plant can't justify special mention in a 25 year plan. Deal with developments on their merits.

51 – A heat recovery report has recently been published covering thermal power stations and this should inform the Proposed Plan.

61, 65 – Update re Longannet.

Q33 Do you agree that the strategic development plan should support the role of Peterhead in transmitting renewable energy and developing the links to Norway and north-east England in particular?

7, 15, 17, 30, 57, 59, 61, 64, 66, 75, 77, 82 – Yes, this is a priority issue and a key opportunity.

17 – Taking energy from Norway seems a little contradictory.

30 – Support a pan-European network. Our own pumped storage and compressed air storage would also help even out supply.

45 – If it comes forward as a proposal it should be looked at as an option on a broad and unrestricted plan for the future. Don't try to subvert the options now.

51 – The Proposed Plan could address in some detail the challenges posed by the need for converter stations in and around Peterhead.

53 – NorthConnect welcome the generally positive approach taken by the MIR to planning for transmission infrastructure and the link with Norway in particular. We agree that the SDP should be supporting the Peterhead area as being an important hub for electricity transmission as it has key strategic advantages.

55 – The positive recognition of electricity transmission issues in the MIR is supported and the SDP should fully support the role of Peterhead in transmitting renewable energy and in developing the links to Norway and north east England.

55 – Updated details (provided) regarding projects, development components and timescales should be reflected in the SDP.

66 – As long as it can be delivered in a sensitive and environmentally responsible manner. Consideration should be given to organising an international design competition.

Q34 Do you agree that an electricity transmission masterplan is an appropriate way of co-ordinating the various projects in this area?

7, 15, 17, 30, 57, 59, 61, 66, 75, 77, 82 – Yes, this is a priority issue and a key opportunity.

15 – The responsible body would need to be established.

51 – The idea of masterplanning seems sound.

53 – No, Northconnect do not agree that a masterplan is an appropriate way of co-ordinating the transmission projects. We believe this is impractical because of regulatory business separation and competition law, transmission connection offers, different owners, timescales, consenting routes and commercial drivers. The effect of masterplanning could be to escalate or transfer costs from one project to another (prohibited by the regulatory framework).

53 – NorthConnect are happy to ordinate health and safety and communication activities with other projects.

53 – NorthConnect are of the opinion that the assessment of cumulative impacts through the EIA will provide the required information and mitigation but would be happy to input information on the project to a landscape capacity study for the area is that was to be progressed.

55 – It is fully recognised that the size and nature of the transmission projects in the Peterhead area have the potential to raise significant planning issues.

55, 57 – It is currently unclear who would deliver the masterplan, on what timescale, how it would be adopted and what the funding or management arrangements would be.

55 – No, SHETL do not agree that a masterplan is an appropriate way of co-ordinating the transmission projects due to licence obligations, and the wider regulatory environment. It is considered that these would make co-ordination through a masterplan very difficult if not impossible if the intention was to include all proposed electricity related projects being considered in the Peterhead area.

55 – The timescales for the various projects mean that there would be insufficient time for an effective masterplan to be prepared. Licence holder obligations preclude any delay to await the preparation of a masterplan.

55 – SHETL have significant concerns regarding a masterplan approach and would strongly object to any emerging SDP that provided that it was.

55 – SHETL are of the view that there are other more appropriate mechanisms to co-ordinate the projects, principally the consideration of cumulative impacts through Environmental Impact Assessments. The SDP could specifically require such consideration even if a formal EIA was not required.

75 – It would be prudent to consider an energy plan for the SDP area to include geothermal and hydrogen as well as other forms of energy.

82 – Appreciate early involvement in this initiative.

Strategic Transport Projects

29 – The changes are not specified and the case has not been made. The CTA identifies them as a conceptual package rather than proposals and they do not have the necessary standing or justification. They should not be included.

51 – Transport Scotland will participate in the on-going consideration of these projects and work with partners to refine their detail and phasing.

51 – In addition to these schemes, individual developments will be required to mitigate their individual impacts on the trunk road network through the development management process.

51 – Transport Scotland welcome the commitment to use masterplanning to deliver well-designed, integrated places and will have a continued involvement in this process.

Additional Proposals

Q21 Are there any other proposals which meet these conditions which should be reflected in the strategic development plan?

7 – Consideration should be given to proposals that could contribute to the diversification of the regional economy.

9 – Job creation initiatives

10 – Greater recognition of the importance of biodiversity in providing a good quality of life, the protection of designated sites and enhancing greenspace in the City and Aberdeenshire's towns. The protection of mature trees.

11 – Various roads proposals in terms of re-routing traffic on existing roads.

11 – Collaborate with oil companies to improve public transport, an all-electric bus fleet using locally produced electricity.

14 – Establish a company with the private sector to formulate plans, get approvals, arrange finance and oversee implementation to revitalise the city. Turn Union Street over to pedestrians with limited vehicle access, a PV roof and around 5,000 trees, with each 400m zoned to give different environments. A people-mover along the length of Union Street with a circular bus route in the short-term. Selective redevelopment of properties along Union Street. Union Terrace Gardens must be the centre-piece with enhanced connectivity, parking and a new and attractive place to spend time. Make something of the harbour area which has such potential. Area between Dee and Don to be a marina-based mixed use development. Approach the private sector with well thought-out plans using the best talent in the world to create an attractive proposition for our numerous "wealth creators".

15 – Kinclunly Village will deliver an ultra-sustainable village.

17 – Hydro-electricity.

24 – Local electricity distribution networks, to bring the benefits of locally produced energy to local communities.

30 – Congestion charging, car park charging, comprehensive bus network, effective bus lanes and ticketing, city centre pedestrianisation and enforced workplace travel plans.

37 – The MIR appears to contain no detailed mention of external road connectivity. Tactran is concerned that the Scottish Government's recent Infrastructure Investment Plan makes no mention of STPR Project 29 (A90 improvements through or around Dundee).

38 – A junction on the fastlink at Chapelton of Elsick should be identified.

40 – Retail provision at Loirston

- 45 – Energy need reduction, planning and building control could do much more.
- 49 – There should be scope to implement key projects not included in the plan.
- 49 – Export water from the ports.
- 51 – The Proposed Plan could play a key role in ensuring effective cross-boundary collaborative working to embed the development of the green network concept. A particular role for the Proposed Plan could be to look at active travel routes.
- 52 – A link road between the Netherly Road and the Slug Road, possibly including a supermarket.
- 55 – The Peterhead 400kV Sub-station Project should be reflected and supported by the SDP.
- 57 – North of the Don Masterplan
- 59 – Public transport and Park and Ride sites.
- 63 – Link road from Inchgarth Road to North Deeside Road.
- 64 – Increase the use of offshore energy generation as a matter of urgency.
- 67 – Cycling is largely ignored in the MIR and there should be a strategic commitment to increase levels of cycling. Moving towards 10% cycling would address a range of issues and the SDP should address the infrastructure requirements of this. A high quality cycle network along the strategic growth corridors should be included in the SDP.
- 75 – Geothermal / Hydrogen powered CHP in the Energetica Corridor.
- 76 – Re-open the Deeside Line. Support public transport with subsidies and reintroduce the Heather Hopper Service (Ballater to Perth).
- 76 – Transition Towns initiatives
- 76 – Offshore wind farms
- 77 – Dual-track the railway from Huntly to Laurencekirk to facilitate much more use of the railway.
- 82 – We strongly recommend a broadly worded green network vision and indicative spatial strategy, linking open space in Aberdeen to the urban fringe and countryside of Aberdeenshire. This aligns very strongly with the vision and aims of the plan.