

24 April 2019

For the attention of the Local Development Plan Team

**Nestrans' response to the Aberdeen City Local Development Plan Main Issues Report**

Thank you for the opportunity to comment on the Aberdeen Local Development Plan Main Issues Report. We have provided comments below and this response was considered by the Nestrans Board at its meeting on 17<sup>th</sup> April 2019.

As I am sure you are already aware, Nestrans has started work on the development of a new Regional Transport Strategy which we hope to have complete by the end of 2019. This new strategy will reflect the fact that many of the large infrastructure projects contained within the current strategy have now been or will soon be delivered. It is anticipated that the new strategy will likely focus to a greater degree on maximising the benefits of existing infrastructure, promoting modes other than the private car and environmental factors such as alternative fuels.

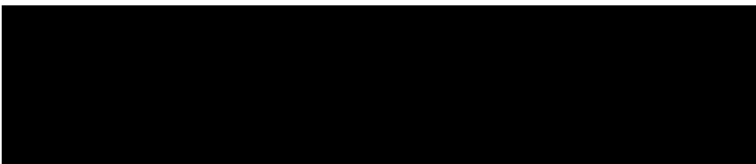
I would be grateful if you could consider the following comments on the Main Issues Report:

- Q5 – agree that the LDP City Centre boundary and CCMP boundary should match – however, there is a need to be cognisant of any implications for parking controls if controlled parking zones or parking standards are linked to city centre boundary;
- Intervention Area: Station Gateway – this should make reference to the bus station. Even though it is owned and operated privately, it is still a key gateway to the city and in its current state is not adequate in terms of capacity and the facilities it provides. It should be an integral part of the station gateway proposals;
- North Dee – the proposal for a new multi-storey car park of 450 spaces would need to be considered against parking standards and demonstrate its fit with the Strategic Car Parking Review and policy to reduce car parking in the city as highlighted in section 5.2 of the Main Issues report;
- Q6 – yes, we would agree that the CCMP sites should be included in the LDP;
- Q9 – yes, high footfall uses should be directed to existing centres and no we should not be considering out of town retail centres primarily because of the impact on travel and because they will encourage trips by car and exclude people without access to a car. The focus should be on the city centre which is easily accessible to all and can be served by high quality public transport, cycling and walking in order to encourage mode shift;
- Main Issue 1: Living in the City Centre – yes, we support residential accommodation in the city centre in order to maximise the number of people who can walk and cycle to work, shopping etc.;

- Q16 – the quality and quantity of external amenity space should give consideration to how cars and parking affect the environment. Promoting spaces and places that facilitate walking and cycling will contribute to enhanced quality of life;
- Section 5.1: Transport Background – The LDP should acknowledge that the City Council are members of the North East Bus Alliance and working in partnership to encourage enhanced bus services throughout the City;
- Welcome reference to the Regional Parking Strategy;
- Q19: City Centre parking – yes, there is an opportunity to reduce car parking in the city centre. The Strategic Car Parking Review found that there was an abundance of parking, that it was cheap relative to comparator cities and that parking standards for new developments was high. The opportunity to extend Controlled Parking Zones and constrain parking in new developments would be consistent with the findings of SCPR and with the principles in the LDP;
- Section 5.3: Transport Emissions – the Main Issues Report should make mention of the need to reduce pollution from traffic and the proposal to implement a Low Emission Zone in the City Centre;
- Q21: Developer Obligations and Infrastructure Delivery – yes, there is a need to address the cumulative impacts of development and a mechanism for infrastructure needs to be identified and to be funded. The Strategic Transport Fund has been quashed, but the issues that it was trying to address remain and they are not addressed by the current system.

Thank you again for the opportunity to comment. Please do not hesitate to contact me should you wish to discuss any of our comments in more detail.

Yours sincerely



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